

EX. PLF A

Deposition Transcript

Case Number: 1:24-CV-24228-CMA

Date: July 21, 2025

In the matter of:

MEGAN PETE v MILAGRO ELIZABETH COOPER

Milagro Elizabeth Cooper

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**CERTIFIED
COPY**

Reported by:
Ronny Zavosky

Steno
Agency, Inc.

315 West 9th Street
Suite 807
Los Angeles, CA 90015
conciierge@steno.com
(888) 707-8366
NV: Firm #108F



MILAGRO ELIZABETH COOPER
JULY 21, 2025

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JOB NO. 1844353

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

Civil Action No.1:24-
CV-24228-CMA

MEGAN PETE, an individual,

Plaintiff,

vs.

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.

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VIDEOTAPED DEPOSITION OF

MILAGRO ELIZABETH COOPER

LOS ANGELES, CALIFORNIA

MONDAY, JULY 21, 2025

REPORTED BY:
RONNY ZAVOSKY
CSR NO. 12359
JOB NO. 1844353

MILAGRO ELIZABETH COOPER
JULY 21, 2025

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1 The deposition of MILAGRO ELIZABETH COOPER was
2 taken on behalf of the Plaintiff at 865 South Figueroa
3 Street, 10th Floor, Los Angeles California, commencing
4 at 9:28 AM on Monday, July 21st, 2025, before
5 Ronny Zavosky, CSR No. 12359.

6
7
8
9 A P P E A R A N C E S

10
11 FOR THE PLAINTIFF:

12
13 QUINN EMANUEL URQUHART & SULLIVAN, LLP

14 BY: MARIE HAYRAPETIAN, ESQ.

15 865 South Figueroa Street, 10th Floor

16 Los Angeles, California 90017

17 (213) 443-3000

18 mariehayrapetian@quinnemanuel.com
19
20
21
22
23
24
25

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1 A P P E A R A N C E S (Continued):

2

3 QUINN EMANUEL URQUHART & SULLIVAN, LLP

4 BY: JOHN F. O'SULLIVAN, ESQ.

5 DANIEL L. HUMPHREY, ESQ.

6 (Appeared via teleconference.)

7 2601 South Bayshore Drive, Suite 1550

8 Miami, Florida 33133

9 (786) 850-3630

10 johnosullivan@quinnemanuel.com

11 Danielhumphrey@quinnemanuel.com

12

13

14 FOR THE DEFENDANTS:

15

16 DIXON JUSTICE CENTER

17 BY: RONDA R. DIXON, ESQ.

18 400 Corporate Pointe, Suite 300

19 Culver City, California 90230

20 (323) 641-2731

21 ronda@dixonjusticecenter.com

22

23

24

25

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1 A P P E A R A N C E S (Continued):

2

3 ASILIA LAW FIRM, P.A.

4 BY: JEREMY McLYMONT, ESQ.

5 33 SW 2nd Avenue, Suite 1100

6 Miami, Florida 33130

7 (786) 420-0314

8 jeremy@asilialaw.com

9 (Appeared via teleconference.)

10

11

12

13 ALSO PRESENT:

14

15 JULIE PARKER, VIDEOGRAPHER

16 AUTUM TAYLOR, STENO TECH

17 GABBY TREVINO, PARALEGAL AT QUINN EMANUEL

18

19

20

21

22

23

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1 MONDAY, JULY 21, 2025; LOS ANGELES, CALIFORNIA

2 9:28 AM

3 - - -

09:28:05 4 THE VIDEOGRAPHER: Good morning. We are on
09:28:28 5 the record. My name is Julie Parker. I'm a
09:28:33 6 videographer contracted by Steno. I'm not financially
09:28:37 7 interested in this action, nor am I a relative or
09:28:41 8 employee of any of the attorneys or any of the parties.

09:28:49 9 Today is July 21, 2025. The time is 9:28 AM
09:28:58 10 Pacific time. The deposition is taken at 865 South
09:29:03 11 Figueroa Street, Tenth Floor, Los Angeles, California
09:29:08 12 90017. The deposition is also taken remotely via Steno
09:29:13 13 Connect Zoom.

09:29:14 14 The name of the case is Pete versus Cooper in
09:29:19 15 the Superior Court -- or District Court. The case
09:29:21 16 number is 1:24-CV-24228-CMA. This is the video-recorded
09:29:32 17 deposition of Milagro Elizabeth Cooper.

09:29:37 18 Would counsel in the room please identify
09:29:39 19 yourselves and state who you represent.

09:29:43 20 MR. O'SULLIVAN: For the Plaintiff,
09:29:43 21 John O'Sullivan from Quinn.

09:29:48 22 MS. HAYRAPETIAN: Marie Hayrapetian also from
09:29:49 23 Quinn Emanuel on behalf of the Plaintiff Megan Pete.

09:29:51 24 MS. DIXON: Ronda Dixon on behalf of the
09:29:53 25 Defendant Milagro Cooper.

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09:29:59 1 MR. O'SULLIVAN: I'll just say we have some --
09:30:00 2 some people on the Zoom. A number of those are from my
09:30:02 3 office in Miami, and they're -- some are young people
09:30:06 4 just watching, and lawyers who are working on this case.
09:30:09 5 And I don't know, Ronda. Do you have anybody
09:30:12 6 on?
09:30:12 7 MS. DIXON: I thought Jeremy was supposed to
09:30:14 8 be on. Let me see.
09:30:18 9 MR. O'SULLIVAN: Anyway. He has -- he has the
09:30:19 10 details; right?
09:30:21 11 MS. DIXON: Uh-huh. I believe so. Yes.
09:30:24 12 THE VIDEOGRAPHER: Okay. Are we ready to
09:30:26 13 proceed?
09:30:26 14 MR. O'SULLIVAN: Yes.
09:30:28 15 THE VIDEOGRAPHER: The court reporter today is
09:30:29 16 Ronny Zavosky with Steno.
09:30:30 17 Would the reporter please swear in the
09:30:32 18 witness?
09:30:33 19 THE COURT REPORTER: My name is Ronny Zavosky.
09:30:33 20 I am a certified shorthand reporter licensed in the
09:30:33 21 state of California. My license number is 12359.
09:30:33 22 I will now swear in the witness.
09:30:33 23 - - -
09:30:33 24 MILAGRO ELIZABETH COOPER,
09:30:33 25 having first declared under penalty of perjury to tell

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09:30:33 1 the truth, was examined and testified as follows:

09:30:52 2 THE WITNESS: Yes.

09:30:53 3 - - -

09:30:53 4 EXAMINATION

09:30:53 5 BY MR. O'SULLIVAN:

09:30:53 6 Q Okay. Good morning, Ms. Cooper.

09:30:55 7 A Good morning.

09:30:56 8 Q My name is John O'Sullivan. I'm one of the
09:31:00 9 lawyers for Ms. Pete, and I'm going to be asking the
09:31:03 10 questions today.

09:31:04 11 Have you ever given testimony before?

09:31:06 12 A No.

09:31:07 13 Q Okay. Not -- not in something like this.

09:31:08 14 How about in court?

09:31:09 15 A No.

09:31:11 16 Q All right. Have you ever been under oath
09:31:12 17 before in your whole life?

09:31:15 18 A Not that I recall.

09:31:16 19 Q Okay. Did you have a chance to talk to your
09:31:21 20 lawyer about just the process of what this is going to
09:31:22 21 be?

09:31:24 22 A My lawyer spoke to me about what a deposition
09:31:26 23 is.

09:31:27 24 Q Okay. So I'm here to get your best testimony.
09:31:31 25 And as we talked about before, I'll ask you to wait for

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09:31:36 1 the end of the question. And -- and what we already
09:31:38 2 told you -- is to think about what it's really asking
09:31:40 3 and give me your best answer.

09:31:42 4 If there's any point where I ask a question
09:31:45 5 and you don't understand, just tell me that. Don't
09:31:48 6 answer the question if you don't understand it. Tell me
09:31:48 7 you don't understand and we'll try to fix it. I want to
09:31:50 8 give you a question you understand, and I want to get
09:31:51 9 your truthful answer. Okay?

09:31:53 10 A Okay.

09:31:53 11 Q Deal. There may be situations where your
09:31:59 12 lawyer will object to something. I'll ask a question,
09:32:01 13 and she'll say, "I object." Most of the time that means
09:32:04 14 she's just putting that in the record so that they
09:32:07 15 can -- we can argue about it later, whether that
09:32:09 16 testimony can ever be used.

09:32:12 17 There may come an occasion where she'll tell
09:32:14 18 you, "I object and don't answer the question" because
09:32:18 19 it's privileged, there's -- there's some narrow
09:32:21 20 categories where I can't know that. But other than the
09:32:23 21 times when she says, "Don't answer the question," even
09:32:25 22 if she objects, you need to answer and then the judge
09:32:28 23 will decide later whether that gets dealt with.

09:32:30 24 A Okay.

09:32:31 25 Q Follow that? Okay.

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09:32:35 1 Any questions for me about the process?

09:32:37 2 A Not at this time.

09:32:38 3 Q Okay. All right. Just a little background.

09:32:42 4 Where did you grow up?

09:32:43 5 A In Houston, Texas.

09:32:45 6 Q Okay. Born and raised -- lived there your

09:32:47 7 whole life?

09:32:48 8 A I was born and raised. I did not live there

09:32:50 9 my whole life.

09:32:51 10 Q Okay. Where else have you lived besides

09:32:52 11 Houston?

09:32:53 12 A I have lived in -- at Fort Campbell on an Army

09:32:57 13 base.

09:32:58 14 Q Okay. Is that when you were growing up?

09:33:00 15 A No. As an adult.

09:33:01 16 Q Okay. And what caused you to be living on an

09:33:04 17 Army base as an adult?

09:33:06 18 A I was a spouse to a Army member.

09:33:09 19 Q Okay. And is Fort Campbell in Texas?

09:33:13 20 A No. It's in Kentucky. It's right on the line

09:33:15 21 of Kentucky and Tennessee.

09:33:17 22 Q Okay. And your husband's in the military?

09:33:20 23 A Was. He is a veteran now.

09:33:21 24 Q Okay. And, I guess, starting with high

09:33:27 25 school, can you just trace how you got to be who you are

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09:33:30 1 right now. Your sort of jobs along the way.

09:33:33 2 A Okay. Well, by the time I made it to

09:33:37 3 high school, I thought I wanted to be a doctor; so I was

09:33:40 4 in a forensics program and in a -- I forget the name of

09:33:46 5 it, but I was in a program centered around medical

09:33:50 6 things; and then I was in a forensics class as well,

09:33:53 7 like I said, because that was an extension of the

09:33:55 8 DeBakey program in Houston that I was in, in middle

09:33:55 9 school.

09:33:58 10 Q An extension of a debating program?

09:34:00 11 A A DeBakey.

09:34:02 12 Q DeBakey. Yes. I've heard of it. Okay.

09:34:02 13 A Yeah. So I was so interested in that.

09:34:04 14 So I go through high school, and I graduated

09:34:06 15 at 17 and went to Sam Houston State University because I

09:34:10 16 changed my mind about my major, and I wanted to go into

09:34:13 17 criminal justice. And I wanted to be a victim advocate

09:34:15 18 so that was my major. And so --

09:34:19 19 Q Let me separate there. So -- so Sam Houston

09:34:21 20 University. Criminal justice major?

09:34:23 21 A Yes.

09:34:23 22 Q Okay. And what year did you start at

09:34:25 23 Sam Houston?

09:34:26 24 A 2010.

09:34:27 25 Q 2010. Okay.

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09:34:28 1 A Uh-huh.

09:34:29 2 Q And so take me from there.

09:34:31 3 A Okay. And so I am in school going through

09:34:35 4 classes, trying to figure things out. Had a misstep

09:34:37 5 with -- you go to an adviser to figure out what courses

09:34:41 6 you should take and what you should do. I didn't pick

09:34:43 7 the right things, and so I had to transfer schools.

09:34:47 8 Q 'Cause you couldn't get where you needed to

09:34:49 9 get where you were?

09:34:49 10 A Right. Exactly.

09:34:50 11 Q Okay.

09:34:51 12 A So I transferred to Lamar.

09:34:54 13 Q Lamar?

09:34:55 14 A In Orange, Texas.

09:34:57 15 Q And that was in 2012?

09:34:59 16 A 2011.

09:35:00 17 Q 2011.

09:35:01 18 A Uh-huh.

09:35:01 19 Q Okay.

09:35:02 20 A And then I went to school there for a while,

09:35:03 21 and then I had a daughter --

09:35:05 22 Q Uh-huh.

09:35:06 23 A -- in 2012. So I'm out of school at that

09:35:11 24 point, and then I go back home.

09:35:13 25 So I'm back with my mother -- my grandmother

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09:35:16 1 adopted me so that's my mother. I went back home. She
09:35:20 2 lives in Point Blank, literally.

09:35:24 3 Q Point Blank?

09:35:25 4 A Point Blank. Literally. It's in -- I don't
09:35:28 5 want to curse. I will say the middle of nowhere.

09:35:31 6 Q Point Blank, Texas?

09:35:33 7 A Yes.

09:35:33 8 Q Is where your Grandma lives?

09:35:35 9 A By Cut and Shoot.

09:35:36 10 Q The other town is Cut and Shoot?

09:35:38 11 A Okay. I didn't live there, but it's close.

09:35:39 12 Yeah. Those are the names of these places.

09:35:41 13 So I went to -- I went back home with my
09:35:44 14 grandmother, and then I'm living there, trying to get
09:35:47 15 back into college, take up a relationship. And in 2012,
09:35:50 16 later in the year, is when I get married to my husband,
09:35:54 17 August of 2012.

09:35:58 18 Q August 2012.

09:35:59 19 You are still married to the same person?

09:36:01 20 A Yes.

09:36:01 21 Q Okay. And -- okay. Forward from there.

09:36:03 22 A And then this is when we make the move to
09:36:05 23 Fort Campbell --

09:36:06 24 Q Okay.

09:36:07 25 A -- in 2012. We stayed for the rest of his

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09:36:11 1 contract, through maybe 2015, and I have been in
09:36:15 2 Houston -- we're both from Houston. I've been back
09:36:18 3 since 2015.

09:36:19 4 And to answer your question how I got into
09:36:22 5 this, at Fort Campbell I took up classes again. I
09:36:24 6 started online because of the location.

09:36:27 7 When you are in the Army, you can get moved to
09:36:29 8 different places; so you have to make sure that your
09:36:31 9 schooling wouldn't be affected. So I begin schooling at
09:36:34 10 the University of Phoenix online in -- maybe about 2012
09:36:41 11 or '13. And then --

09:36:45 12 Q Any particular focus of the classes?

09:36:47 13 A At this time, I am majoring in psychology. No
09:36:56 14 other school has the same concentration as Sam Houston.
09:37:00 15 It's one of the best criminal justice schools, and they
09:37:03 16 have a lot of different things you can get into. So I
09:37:05 17 had to minor in criminal justice, because they just
09:37:08 18 didn't have what I wanted, and I majored in psychology.

09:37:11 19 Q Okay. This is University of Phoenix?

09:37:13 20 A Yes.

09:37:13 21 Q You majored in psych and minor in criminology?

09:37:15 22 A In criminal justice.

09:37:17 23 Q Criminal justice?

09:37:18 24 A Yeah. It's a Associate of Arts in Criminal
09:37:20 25 Justice is what I ended up getting from this.

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09:37:24 1 Q Okay.

09:37:24 2 A Uh-huh.

09:37:25 3 Q And?

09:37:25 4 A I graduated with a bachelor's in psychology?

09:37:28 5 Q Okay. So you have a bachelor's in psych.

09:37:30 6 A And I began my master's program, but I didn't
09:37:32 7 finish it.

09:37:32 8 Q Okay. And within psychology, was there any
09:37:34 9 particular focus you -- you --

09:37:36 10 A It was overbroad. Yeah. It wasn't anything
09:37:38 11 in particular. Just a Bachelor of Science in
09:37:41 12 Psychology.

09:37:42 13 And so, as I'm going to school, raising my
09:37:45 14 children, I was a stay-at-home mom. This is when I pick
09:37:47 15 up the YouTube. It was suggested by a friend who
09:37:51 16 thought I was funny, and said, "You could do that." And
09:37:55 17 I started doing reviews on television shows in maybe
09:37:58 18 about 2017-ish. So I'm a literally getting up and
09:38:06 19 reviewing reality TV. And so that's how it got started
09:38:11 20 with streaming and stuff like that.

09:38:13 21 Q And -- and did you just come up with the idea
09:38:14 22 on your own? You saw other people doing and it, and
09:38:17 23 said, "Maybe I can get into that."

09:38:18 24 A It was suggested to me. A friend of mine came
09:38:19 25 to me, and she said, "Girl, you are so funny, and I

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09:38:22 1 think that you should do this." She had been watching
09:38:24 2 other YouTube videos. And so I went and checked out
09:38:27 3 a couple of videos. I had no idea people even did stuff
09:38:30 4 like that.

09:38:30 5 Q Right.

09:38:30 6 A I wasn't -- I used YouTube to watch music
09:38:33 7 videos.

09:38:33 8 THE COURT REPORTER: Wait, you're talking
09:38:33 9 really fast.

09:38:33 10 THE WITNESS: Oh, sorry.

09:38:34 11 MS. DIXON: And also wait until he asks a
09:38:36 12 question.

09:38:37 13 THE WITNESS: Okay. Okay.

09:38:40 14 So I used YouTube for music videos. So I
09:38:43 15 wasn't aware of the fact that people were necessarily
09:38:46 16 uploading videos of themselves and giving opinions and
09:38:48 17 stuff like that.

09:38:49 18 So a friend of mine called me. She had been
09:38:53 19 watching videos. And she said, "You're funny, girl. I
09:38:55 20 think you could do this."

09:38:56 21 And I said, "Well, what are you talking about?
09:38:58 22 What you are watching?"

09:38:59 23 So she gave me a couple of names, and then I
09:39:01 24 went and watched them, and I felt like I could do that
09:39:04 25 easily. And I started. I literally just watched a

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09:39:08 1 show. I got on camera, standing in the corner of my
09:39:10 2 room, and said, "You guys, this is what happened on the
09:39:12 3 show." And it took off.
09:39:17 4 BY MR. O'SULLIVAN:
09:39:18 5 Q And who were the people you watched just to
09:39:19 6 get an idea of whether you could do it? Do you
09:39:22 7 remember?
09:39:22 8 A Oh, gosh. No. It was so long ago. I'll give
09:39:26 9 you -- there was one content creator named Bindi Bleu.
09:39:30 10 Q Bindi Bleu?
09:39:31 11 A Uh-huh. I know she was one I saw, for sure.
09:39:33 12 Q And -- and what did she talk about?
09:39:35 13 A At the time reality television.
09:39:37 14 Q Okay. And what -- what would be an example of
09:39:40 15 reality television?
09:39:41 16 A I started with "Love and Hip Hop: Atlanta."
09:39:45 17 Q "Love and Hip Hop: Atlanta"?
09:39:47 18 A Yes.
09:39:47 19 Q Okay. And that's one of those contestant
09:39:49 20 shows and then --
09:39:49 21 A It was a show centered around celebrities who
09:39:53 22 were in relationships. And just an inside look into the
09:39:56 23 behind the scenes, and how they navigate being famous
09:40:00 24 and trying to keep things together.
09:40:03 25 Q Okay. And then you would give commentary on

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09:40:05 1 that?

09:40:05 2 A Right.

09:40:06 3 Q And at least for you, how -- how does the --
09:40:14 4 is there a financial side? Are you making money doing
09:40:16 5 this?

09:40:18 6 That's a broad question.

09:40:19 7 At any time -- like, now, is it profitable to
09:40:21 8 you to do this?

09:40:26 9 A I would say no. I make money, yes.
09:40:31 10 Profitable at this time? No.

09:40:33 11 Q 'Cause you are building -- like, you are
09:40:35 12 putting the money back in or?

09:40:37 13 A No. Because my platforms are not all
09:40:41 14 monetized.

09:40:42 15 (The Court Reporter requested clarification.)

09:40:42 16 THE WITNESS: Are not all monetized.

09:40:42 17 BY MS. HENDERSON:

09:40:44 18 Q All right. So maybe if you -- it's kind of an
09:40:45 19 open question, but if you just explain, from your
09:40:47 20 understanding, like, how -- how the business that you
09:40:49 21 are getting into works. Like, what you are trying to
09:40:51 22 do, and how the economics work.

09:40:53 23 A Okay. When I began YouTube, I was already
09:40:55 24 taken care of and comfortable in my life; so I didn't
09:40:59 25 get into it hoping to make money. It was just for fun.

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09:41:02 1 Q Uh-huh.

09:41:03 2 A Based on how much you may curse or some of the
09:41:07 3 subject matter, you may get demonetized, because then
09:41:11 4 ads may not run on videos of that nature. I am a person
09:41:15 5 who does curse a lot.

09:41:16 6 So there was a time, in the beginning, where I
09:41:20 7 was able to use AdSense and get money from YouTube, but
09:41:27 8 then it stopped. Because I realized if I want to be
09:41:29 9 able to speak through what I want to speak, then I
09:41:32 10 cannot have the channel monetized.

09:41:34 11 So that's why it's -- it hasn't been monetized
09:41:38 12 since at least maybe 2019-ish. 2018 maybe, 2019 -- I
09:41:42 13 would say.

09:41:44 14 Q Okay. So you are saying that if you wanted to
09:41:48 15 be commercial, if you wanted to monetize, it there's
09:41:50 16 going to be constraints on what you could say?

09:41:52 17 A Absolutely.

09:41:53 18 Q And -- and so did you say, "I'd rather be free
09:41:56 19 to say whatever I want" --

09:41:57 20 A Absolutely.

09:41:58 21 Q -- "then have to answer to advertisers"?

09:41:59 22 A Yes.

09:42:00 23 Q Okay. And have you -- I think you said not
09:42:07 24 all my platforms are monetized.

09:42:09 25 Are any of your platforms monetized?

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09:42:12 1 A Oh, Twitch is a platform I use now. It is
09:42:15 2 subscriber-based; so people subscribe. That's how you
09:42:21 3 would get paid there. And I believe that they run ads
09:42:24 4 as well, and you get a portion of ads' ad money or
09:42:29 5 however that works.

09:42:30 6 Q Maybe you could -- so -- so Twitch is one
09:42:33 7 place where you are on that platform, you get some --

09:42:36 8 A Yes.

09:42:36 9 Q -- money from them.

09:42:37 10 And how does that work? You just get the
09:42:39 11 deposit every month?

09:42:40 12 A Once a month you get a deposit, and it -- it
09:42:42 13 fluctuates based on user engagement -- how many people
09:42:45 14 subscribe to you.

09:42:47 15 Q Okay. Is it generally the same for all the
09:42:49 16 platforms, or each one different?

09:42:50 17 A Each one is different.

09:42:52 18 Q All right. So staying with Twitch, do you
09:42:53 19 know how they calculate how much they pay you?

09:42:55 20 A I do not know.

09:42:57 21 Q Do you have any sense of what you can do on
09:42:59 22 your side to get it to be more?

09:43:05 23 A Consistency is always the first thing that
09:43:08 24 they say.

09:43:09 25 Q Consistently in audience size?

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09:43:10 1 A No. In terms of putting out content.

09:43:13 2 Q Okay.

09:43:13 3 A Because YouTube people watch, and they run
09:43:17 4 ads and you get paid. Twitch people have to subscribe,
09:43:19 5 and they run ads. So they can watch it until they're
09:43:23 6 blue in the face, but if they don't like it, you are not
09:43:25 7 going to get paid. They need to subscribe.

09:43:28 8 So the way to grow it, it's -- it depends on
09:43:31 9 what you feel like your goals are and what works for
09:43:34 10 you.

09:43:34 11 Q But, for example, on Twitch, it's -- it's --
09:43:38 12 is -- is there the issue about using language and
09:43:40 13 things?

09:43:41 14 A No.

09:43:42 15 Q No?

09:43:42 16 A All you have to do is --

09:43:43 17 Q They subscribe?

09:43:44 18 A -- just talk a lot. Exactly.

09:43:46 19 And you can let them know. There's a box you
09:43:49 20 can check that says, "This video will contain profanity.
09:43:52 21 It's not for children or teens." So you can check that
09:43:54 22 off, and you are good to go. And that's what I do with
09:43:56 23 that platform.

09:43:57 24 Q Okay. And just ballpark, over the course of a
09:44:03 25 year, what's your average monthly take from Twitch?

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09:44:07 1 Just for now, like this year? Not to the penny, just
09:44:11 2 approximately.

09:44:12 3 A I could make between 5,000 and 10,000 on
09:44:18 4 Twitch.

09:44:19 5 Q A month?

09:44:19 6 A A month.

09:44:20 7 Q Okay. And has that -- has that been pretty
09:44:22 8 steady -- that level?

09:44:26 9 A It fluctuates. I wouldn't say that was
09:44:29 10 steady. I would say more in recent months.

09:44:32 11 Q Okay. And do you -- do you have a sense
09:44:36 12 yourself, as the -- as the talent, what drives the
09:44:39 13 business? Like, what makes -- what gets you from 5 to
09:44:42 14 10 to maybe 50? What would you be needing to do?

09:44:46 15 A To be honest with you, I'm a content creator.
09:44:49 16 That's because it's for fun for me, and I truly enjoy
09:44:53 17 engaging with the people. That's where I put my focus.

09:44:56 18 I don't -- some people make it on camera and
09:44:59 19 really get a set and go to the max. And I'm sure there
09:45:02 20 are things I could do to grow my platform. But I do
09:45:05 21 really enjoy the personal type of connection in that --
09:45:09 22 what feels like a more one-on-one and smaller group of
09:45:11 23 people. So I feel like it will grow organically, you
09:45:14 24 know, how it's supposed to.

09:45:16 25 Q Uh-huh. Do you -- do you have anybody who

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09:45:18 1 helps you with the business side of all this, or you run
09:45:22 2 it all yourself?

09:45:23 3 A I do everything myself.

09:45:24 4 Q Okay. And you've just learned as you've gone
09:45:26 5 along, at least the business side?

09:45:29 6 A Literally, Google and YouTube videos.

09:45:31 7 Q Yes. Okay. So -- So Twitch, you maybe get 5
09:45:34 8 to 10K a month when it's good.

09:45:36 9 What other platforms are you on?

09:45:38 10 A I'm on STATIONHEAD.

09:45:41 11 Q And what's the finances of that? Is there
09:45:42 12 money involved?

09:45:44 13 A I have a contract with STATIONHEAD.

09:45:45 14 Q And what are the basic terms of that?

09:45:47 15 A That I do a show. My -- the show that I
09:45:50 16 already had been doing on other platforms, they asked if
09:45:53 17 I could bring that to their platform.

09:45:56 18 Q Exclusively?

09:45:56 19 A Not exclusively. I didn't have to just do it
09:45:59 20 with them, but at least five days a week come and do a
09:46:02 21 show on STATIONHEAD.

09:46:04 22 Q And -- okay. Does the show have a name?

09:46:08 23 A Mob Radio.

09:46:09 24 Q Mob Radio?

09:46:09 25 A Yeah. It was an extension of everything else

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09:46:11 1 I already had, yeah.

09:46:13 2 Q Okay. And Mob Radio is your brand? You have
09:46:15 3 a trademark and all that?

09:46:16 4 A I have my Mob Radio trademarked and
09:46:18 5 Milagro Gramz trademarked.

09:46:21 6 Q What was the second one?

09:46:22 7 A My moniker Milagro Gramz is trademarked under
09:46:25 8 Mob Radio LLC.

09:46:26 9 Q And is -- obviously, your last name is Cooper.
09:46:31 10 Is Gramz like a stage name or --

09:46:33 11 A Yes.

09:46:33 12 Q And how did you chose that? Just curious?

09:46:36 13 A YouTube needed a last name. I didn't want to
09:46:38 14 use my own name. And I was, like, what's a cool little
09:46:43 15 name. And they called me -- I have a nickname Nino, and
09:46:46 16 so they said, "What about Gramz?"

09:46:49 17 And I said, "Okay. That sounds cute" and ran
09:46:52 18 with it. I'm not tied to it too deeply, to be honest.

09:46:57 19 Q But somebody at YouTube suggested that or
09:46:57 20 your friends?

09:46:58 21 A Yeah, the audience. I spoke with my audience
09:47:00 22 openly, like, "What do you think?" I spoke with my
09:47:03 23 audience and asked them what they thought. We picked
09:47:05 24 it.

09:47:06 25 Q Okay. So STATIONHEAD, the weekly five days a

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09:47:10 1 week?

09:47:12 2 And you said -- what -- what are the economics

09:47:14 3 of that? How would you get paid?

09:47:15 4 A I would get paid once a month.

09:47:17 5 Q Okay.

09:47:18 6 A 6,300.

09:47:20 7 Q 6300 a month. And that assumes you do your

09:47:24 8 five shows.

09:47:24 9 And is there a duration of the contract? How

09:47:27 10 long does it last?

09:47:28 11 A It's open-ended.

09:47:29 12 Q Okay. Could they terminate if your audience

09:47:30 13 went away?

09:47:32 14 A Absolutely. For whatever reason they wanted

09:47:34 15 they could terminate it.

09:47:35 16 Q And you too. Can you terminate at will?

09:47:37 17 A I'm not certain.

09:47:39 18 Q Okay. Is the 6300 a month a function of how

09:47:43 19 many -- how is that determined? That's just the number

09:47:46 20 on the contract?

09:47:46 21 A It's flat.

09:47:47 22 Q It's flat?

09:47:48 23 A Yeah. It's flat. Uh-huh.

09:47:48 24 Q And is there something that would -- would, in

09:47:50 25 your mind, entitle you to get more there? Like, is

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09:47:54 1 there a -- a sliding scale? Or is it -- is it tied to
09:47:58 2 something that then would go up --
09:48:00 3 A No.
09:48:00 4 Q -- if -- if you did better in their eyes?
09:48:02 5 A That's not anything we discussed, no.
09:48:04 6 Q Okay. So whose idea was the 6300? Yours or
09:48:08 7 theirs?
09:48:09 8 A The -- I'm not sure at this time whose idea it
09:48:13 9 was.
09:48:14 10 Q Okay. Did -- did -- who approached who for
09:48:17 11 you to go on STATIONHEAD? Did you reach out to them?
09:48:20 12 A STATIONHEAD came about because of an
09:48:23 13 opportunity I was offered on another show on their
09:48:25 14 platform. So I actually had to do somewhat of an
09:48:29 15 internship for about two years before I was offered a
09:48:32 16 deal by STATIONHEAD; so the STATIONHEAD offered it.
09:48:37 17 Q Okay. And -- And tell me what was -- what was
09:48:40 18 the internship. Who -- who was involved, and what were
09:48:42 19 the terms of that?
09:48:43 20 A Rashida Ali is her name.
09:48:46 21 Q Rashida.
09:48:47 22 How do you spell the last name?
09:48:48 23 A A-L-I.
09:48:49 24 Q Okay. Rashida Ali -- she had a show?
09:48:52 25 A She has a show and a blog titled -- it's

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09:48:55 1 "Onsite!."

09:48:56 2 Q It's "Onsite!"?

09:48:58 3 A Uh-huh.

09:48:59 4 Q Okay.

09:49:01 5 A In 2019, I was asked to appear on the show.

09:49:06 6 Q As a guest?

09:49:07 7 A Auditioning for a gossip column.

09:49:09 8 Q Okay. Okay. So you would -- you are
09:49:13 9 auditioning to be, like, a feature on her show? You'd
09:49:16 10 come in and talk about --

09:49:16 11 A And co-host.

09:49:18 12 Q Co-host?

09:49:18 13 A Uh-huh.

09:49:18 14 Q And your area would be the latest gossip?

09:49:21 15 A It started with -- it started with the gossip
09:49:24 16 column. But once Rah saw my show and -- and she felt
09:49:28 17 like I could do more, it became a co-host. So I was
09:49:33 18 able to give opinions, present topics, and it would be
09:49:37 19 more equal than just cut scene off to the side, gossip
09:49:41 20 column.

09:49:42 21 Q Okay. And when you did -- and then you ended
09:49:45 22 up doing that for two years?

09:49:48 23 A Once I did the -- the preliminary video -- or
09:49:52 24 the preliminary stream, they loved me, and I stayed on.
09:49:55 25 And I actually did my show on STATIONHEAD and a show

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09:49:59 1 with her on STATIONHEAD once a week; so I had two shows
09:50:03 2 on STATIONHEAD, starting in 2019.

09:50:05 3 Q So starting in 2019, you had your show
09:50:07 4 five days a week, Mob Radio?

09:50:10 5 A No. 2019, I was with Rah Ali.

09:50:11 6 Q Okay. I thought you started doing both? No?

09:50:14 7 A It happened late -- you asked me how I got to
09:50:16 8 Mob Radio.

09:50:17 9 Q Yes. All right. So 2019, you start this with
09:50:19 10 Rah Ali, and they love you and your role gets expanded,
09:50:22 11 and it's basically co-hosting.

09:50:26 12 And how long, from starting to do that, until
09:50:28 13 you had your own show?

09:50:30 14 A From 2019 to 2021.

09:50:32 15 Q All right. You got your own show in 2021?

09:50:35 16 A Yes. And a formal contract but they --
09:50:37 17 STATIONHEAD was paying me prior to my formal contract
09:50:41 18 for my show on their platform.

09:50:44 19 Q Okay. And what was your -- the current
09:50:48 20 contract is -- is 6300 a month; right?

09:50:50 21 A Uh-huh.

09:50:51 22 Q And what were you making prior to that
09:50:52 23 contract?

09:50:53 24 A Prior to that, I don't know the exact amount
09:50:56 25 that I was making. It was --

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09:50:58 1 Q Ballpark?

09:50:58 2 A It was -- it was based on viewers at that time

09:51:02 3 and incentives. I don't want to give you an incorrect

09:51:08 4 number. I really don't know.

09:51:10 5 Q I don't want you to, but also -- I mean, it's

09:51:12 6 your business. It's your money. You would have some

09:51:14 7 idea.

09:51:14 8 Was it a million dollars?

09:51:15 9 A No. At that time maybe 500, a thousand

09:51:17 10 dollars.

09:51:18 11 Q A month?

09:51:18 12 A Yeah.

09:51:19 13 Q And you said based on viewers and incentives.

09:51:22 14 What would be a typical -- do you remember

09:51:24 15 what the incentives were?

09:51:26 16 A At the time it was viewers.

09:51:27 17 Q Okay. And so it would be if you hit X

09:51:30 18 viewers, you get a bump in your money?

09:51:34 19 A They had a pay scale. So based on the viewers

09:51:36 20 you got, they were willing to pay a certain amount that

09:51:38 21 month.

09:51:40 22 Q Okay. All right.

09:51:42 23 So you have Twitch, STATIONHEAD.

09:51:49 24 Other -- other platforms that you are out on?

09:51:53 25 A I am now on Kick as well.

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09:51:56 1 Q Kick. Okay.

09:51:57 2 Is there any financial aspect to that?

09:51:59 3 A No. I just started.

09:52:01 4 Q Okay. Could there be?

09:52:02 5 A Yes.

09:52:02 6 Q Is there a way to monetize that?

09:52:04 7 A Yes.

09:52:05 8 Q And what makes Kick different than the other

09:52:07 9 two -- STATIONHEAD and --

09:52:08 10 A Nothing. It's very similar. Almost identical

09:52:11 11 to Twitch.

09:52:12 12 Q Okay. Is it -- does it have -- I assume it's

09:52:15 13 a different audience; right? Or no?

09:52:17 14 A Sometimes. I personally believe many people

09:52:21 15 watch the same people.

09:52:24 16 Q Okay.

09:52:25 17 A So --

09:52:26 18 Q What -- what -- when did you start on Kick?

09:52:28 19 Just --

09:52:29 20 A Within the past three to four months.

09:52:31 21 Q And what made you want to do that?

09:52:34 22 A More income.

09:52:35 23 Q And what -- what's the income proposition

09:52:38 24 there? At Kick?

09:52:41 25 A Once again, it's subscriber-based; so it's

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09:52:43 1 open-ended.

09:52:44 2 Q Okay. And you just get a piece of whatever
09:52:48 3 the monthly take is on the subscribers?

09:52:51 4 A I don't know how they break it down, but, yes,
09:52:53 5 based on subscribers. But I'm fairly new; so I haven't
09:52:58 6 seen a return on that.

09:52:59 7 Q You haven't gotten even one invoice?

09:53:01 8 A No. Huh-uh.

09:53:02 9 Q But you expect it's going to say you have this
09:53:04 10 many subscribers?

09:53:05 11 A Yes.

09:53:06 12 Q And we charge them X a month, and we're going
09:53:07 13 to give you 20 percent?

09:53:09 14 A Right, whatever.

09:53:10 15 Q Okay. Do you know what the split is?

09:53:12 16 A No.

09:53:13 17 Q Okay. So that's new. And you say you -- you
09:53:18 18 don't really see that as a different necessarily --
09:53:21 19 like, a different audience?

09:53:22 20 A I don't.

09:53:23 21 Q Just different way to get to -- okay. So
09:53:25 22 Kick.

09:53:26 23 Other platforms you are on now?

09:53:30 24 A For streaming, that's it -- Twitter,
09:53:32 25 STATIONHEAD -- not Twitter, STATIONHEAD, Twitch, and

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09:53:36 1 YouTube.

09:53:38 2 Q Okay.

09:53:38 3 A Oh. And I have a Rumble. I don't use it now.

09:53:42 4 Q And what is Rumble?

09:53:44 5 A Another streaming platform. It's just like

09:53:47 6 Twitch and Kick, but it confuses me; so I don't use it.

09:53:50 7 Q Okay. So you don't -- you don't -- you are

09:53:53 8 not getting money from them?

09:53:54 9 A No.

09:53:55 10 Q You don't see your fans there?

09:53:56 11 A Right. I've done a few videos on Rumble, but

09:53:58 12 I was confused. I left it.

09:54:00 13 Q Okay. And then -- so that's all -- that's all

09:54:02 14 the places people would find you streaming?

09:54:05 15 A Yes.

09:54:06 16 Q And that's all the places you get money from

09:54:08 17 streaming -- those four; right?

09:54:10 18 A Right. Twitch and STATIONHEAD is where I get

09:54:13 19 money from streaming.

09:54:14 20 Q Right. And Kick might turn into that, but

09:54:16 21 Rumble, no, because you don't use it?

09:54:18 22 A Right.

09:54:18 23 Q All right. What about other social media?

09:54:19 24 Other ways you get your -- your words out there to the

09:54:22 25 people?

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09:54:23 1 A I have a Facebook page.

09:54:25 2 Q Okay.

09:54:28 3 A And a blog page.

09:54:29 4 Q What do you do with that?

09:54:30 5 A It's an extension of my Instagram page where I

09:54:33 6 blog; so it literally sends whatever I post on Instagram

09:54:36 7 to this Facebook page.

09:54:38 8 Q Okay. And do you -- do you make money off

09:54:46 9 Instagram in any way?

09:54:47 10 A No.

09:54:47 11 Q Or you just promote the other things?

09:54:49 12 A I just promote. I don't make money off of

09:54:51 13 Instagram.

09:54:51 14 Q Okay. And do you use Instagram to promote

09:54:53 15 your streaming and --

09:54:55 16 A Yes.

09:54:55 17 Q Streaming here and that. Yes.

09:54:57 18 And have you learned, in doing the business,

09:54:58 19 how that works, meaning, like, the effects you get from

09:55:02 20 certain kinds of promotion and -- and kind of

09:55:05 21 attention-getting stuff?

09:55:06 22 A No. Unfortunately.

09:55:08 23 Q You are still feeling your way?

09:55:11 24 A You know --

09:55:13 25 Q Go ahead --

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09:55:15 1 A It's difficult because I'm the talent; so
09:55:18 2 trying to figure out that background, you know, a lot of
09:55:21 3 people have a team to do all that stuff.

09:55:23 4 So, no, I haven't focused, and I'm not really
09:55:26 5 knowledgeable about those different things.

09:55:30 6 Q Have -- have you developed a sense, just being
09:55:32 7 in it for the time you have, of sort of what sells?
09:55:35 8 What gets eyeballs? What gets attention?

09:55:39 9 A In a way.

09:55:40 10 Q In a way?

09:55:41 11 A Yeah.

09:55:41 12 Q And what -- what do you think is on that list?
09:55:43 13 Like, if you are thinking how am I going to increase my
09:55:46 14 scope, get more people, get more attention, what are the
09:55:49 15 things you've learned that -- that pump that?

09:55:52 16 A I've learned that you need to be accurate,
09:55:54 17 timely with your information, and it needs to be clean,
09:55:59 18 in terms of presentation. I think those are the biggest
09:56:02 19 things.

09:56:04 20 Q And by "clean," do you mean no bad words or?

09:56:07 21 A I mean clean in the way that the visual
09:56:08 22 appears and the sound, and it needs to be produced in a
09:56:11 23 way that people would deem it quality.

09:56:13 24 Q Yes. And -- and on all of those things --
09:56:16 25 clean, accuracy, timely -- do you -- do you try to do

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09:56:21 1 your best on all those?

09:56:22 2 A I do.

09:56:23 3 Q Okay. All right. Other -- other places on
09:56:29 4 social media that you are -- you have a presence?

09:56:34 5 A Instagram, Twitter, Snapchat.

09:56:41 6 Q And I'll just go to Twitter.

09:56:42 7 Do you get any direct economics out of that,
09:56:44 8 or it's just promoting the other things?

09:56:46 9 A I have gotten money from Twitter before.

09:56:48 10 Q Okay. Tell me -- just -- how did it work?
09:56:50 11 What did you do, and what did you get?

09:56:52 12 A Okay. There was a time on a particular page,
09:56:55 13 I had, where based on your -- I believe your engagements
09:57:00 14 on Twitter, twitter would give you a payout. I made no
09:57:04 15 more than \$500 from the entire time, if even that. You
09:57:10 16 would get maybe a \$12 check for a month. I don't know
09:57:13 17 what the scale is and how they do it, but it was very,
09:57:16 18 like, low.

09:57:17 19 Q Okay. And -- and what does -- in that -- in
09:57:23 20 that situation, what does "engagement" mean? Somebody
09:57:28 21 responds to you or?

09:57:29 22 A There was an update on Twitter where they
09:57:30 23 began to show how many people had viewed a post. I
09:57:34 24 believe that's what they were referencing, but I'm not
09:57:37 25 sure.

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09:57:38 1 Q Uh-huh. And then there's some math around
09:57:44 2 that. They say you got 5,000 views, and under our
09:57:48 3 system, that gets you \$4?

09:57:50 4 A No. They don't pay for -- oh, oh, oh. I
09:57:53 5 thought you --

09:57:53 6 Q For Twitter?

09:57:54 7 A Yeah. I believe so, but I'm not certain how
09:57:56 8 they worked.

09:57:57 9 Q But you think that whatever it is, it's
09:57:59 10 engagement-based --

09:58:00 11 A I believe.

09:58:00 12 Q -- and engagement probably means views?

09:58:03 13 A Yes.

09:58:05 14 Q Okay. And -- but, in your case, the best you
09:58:09 15 ever did was \$500? Or everything together was \$500 on
09:58:12 16 Twitter?

09:58:13 17 A And I think that's very -- I think that's
09:58:14 18 exaggerated.

09:58:16 19 Q Okay. And then what about Snapchat?

09:58:20 20 A I never made a dime from Snapchat.

09:58:22 21 Q Okay. And so why do you have that? Just
09:58:24 22 to -- general promotion of your presence and feed the
09:58:27 23 other platforms?

09:58:28 24 A It started actually as a personal page.

09:58:31 25 Q Okay.

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09:58:31 1 A As popularity has grown and more people have
09:58:34 2 become interested in me, it kind of turned into a public
09:58:37 3 page. It's actually a personal Snapchat.
09:58:40 4 Q Okay. Other social media presence?
09:58:52 5 A I have a TikTok.
09:58:54 6 Q Okay. And are there economics around that?
09:58:58 7 Do you get paid for that?
09:58:59 8 A This TikTok was given to me by someone else.
09:59:04 9 Q Okay.
09:59:04 10 A So, when I got it, I was able to get a couple
09:59:08 11 of checks from TikTok, yes.
09:59:15 12 Q So how did that happen? Someone said, offered
09:59:18 13 to give you their TikTok? Or you asked them for it? Or
09:59:21 14 how did that happen?
09:59:22 15 A There was -- one of my pages on social media
09:59:25 16 was targeted and deleted wrongly. And a subscriber of
09:59:30 17 mine said, "I have a TikTok page I don't use. Do you
09:59:34 18 want it?"
09:59:35 19 I said, "Sure."
09:59:39 20 Q What -- is there some identifier of the TikTok
09:59:41 21 account? Like, does it have a name or something?
09:59:46 22 A Yes. It -- I believe it's "MizzInformation"
09:59:49 23 at this time.
09:59:50 24 Q I saw that. Mizz with Zs; right?
09:59:53 25 A Yes, two Zs.

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09:59:55 1 Q Okay.

09:59:55 2 A It's supposed to be an extension of my blog;
09:59:57 3 so it's supposed to be kind of branded the same, but I
10:00:00 4 don't use it at this time; so I'm not certain what the
10:00:03 5 name is at this time. But I believe it's
10:00:05 6 MizzInformation.

10:00:07 7 Q All right. And did you go back and look at
10:00:09 8 any of your old social media or things on your phone or
10:00:12 9 computer to get ready for this deposition?

10:00:16 10 A I looked at the case documents like the
10:00:19 11 Complaint itself. I looked at that.

10:00:22 12 Q All right. What about any of your own
10:00:24 13 personal information that was getting produced, like, in
10:00:26 14 response to the request for documents and the questions?

10:00:30 15 A Yes, I did.

10:00:30 16 Q Did you go back through and just try to
10:00:33 17 remember what was going on?

10:00:34 18 A Yes.

10:00:34 19 Q All right. And did you see in there that that
10:00:36 20 MizzInformation was what you used; right?

10:00:39 21 A I cannot confirm that.

10:00:41 22 Q Okay. 'Cause you didn't see -- like, have
10:00:43 23 you, in the last month, seen anything posted by you to
10:00:49 24 that site or handle?

10:00:51 25 A No.

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10:00:51 1 Q Okay. Can you recall putting up anything at
10:00:54 2 the "MizzInformation"? What -- what is it? A website
10:00:57 3 or a --
10:01:00 4 A It's just a user name.
10:01:02 5 Q Okay. But a user name on what --
10:01:03 6 A For TikTok.
10:01:04 7 Q On TikTok?
10:01:04 8 A Yeah.
10:01:05 9 Q Okay. Have you gone back and looked to see
10:01:09 10 whether there's anything on MizzInformation --
10:01:12 11 A Oh, no.
10:01:13 12 Q -- TikTok that's from you?
10:01:14 13 A No.
10:01:15 14 Q Okay. And do you know -- can you remember
10:01:17 15 today whether you've ever posted anything to that
10:01:20 16 MizzInformation on TikTok?
10:01:23 17 A Yes, I've posted to MizzInformation on TikTok.
10:01:25 18 Yes.
10:01:25 19 Q Okay. And you said something happened to
10:01:27 20 your -- one of your other social media accounts was
10:01:30 21 deleted, and so one of your audience said, "I have this.
10:01:33 22 You can use it"?
10:01:34 23 A Right.
10:01:34 24 Q And do you, like, formally transfer it, like,
10:01:36 25 officially?

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10:01:37 1 A Yes. I met with the person 'cause I know
10:01:40 2 them.

10:01:41 3 Q Okay.

10:01:42 4 A I met with them and -- at their apartment.
10:01:46 5 And we went over it with our phones. You have to do --
10:01:49 6 you have to change the information name, email, phone
10:01:52 7 number. So we did that together.

10:01:55 8 Q Okay. And is it a person in Houston too?

10:01:58 9 A Yes.

10:01:58 10 Q And what is -- him or her?

10:02:00 11 A It's a man.

10:02:01 12 Q And what's his name?

10:02:02 13 A Mike Ray.

10:02:04 14 Q How do you spell the last name?

10:02:05 15 A Ray, R-A-Y.

10:02:07 16 Q Okay. And -- and this person -- did you know
10:02:11 17 Mike before he reached out on -- on, and said, "You can
10:02:14 18 have my TikTok"?

10:02:15 19 A We had a point of reference.

10:02:17 20 Q And what does that mean -- "point of
10:02:18 21 reference"?

10:02:18 22 A I would not call him a friend. He was a fan
10:02:21 23 of my show, and I enlisted him to try to intern for me
10:02:25 24 to post on my blog, but it didn't work out.

10:02:30 25 Q It did, or didn't work out?

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10:02:31 1 A It did not.

10:02:32 2 Q Okay. And other than being a potential intern

10:02:35 3 on your blog, what did Mr. Ray do for a living?

10:02:38 4 A I'm not sure.

10:02:45 5 Q Okay. Did he become an intern for you?

10:02:47 6 A Yes.

10:02:48 7 Q All right. What -- when was that?

10:02:51 8 A I don't -- maybe 2022.

10:02:59 9 Q All right. So -- and prior to him reaching

10:03:01 10 out to you in some way on the -- on the social media,

10:03:04 11 did you know him at all -- Mr. Ray?

10:03:09 12 A No.

10:03:10 13 Q All right. So when some- -- somebody came to

10:03:12 14 you through social media, and this person said, "I'm

10:03:15 15 your fan"?

10:03:16 16 A Right. That's my Mob Radio.

10:03:17 17 Q And you had a dialogue, and at some point you

10:03:18 18 suggested, "Why don't you come and intern with me"?

10:03:21 19 A We -- he was a fan of mine, and he came to a

10:03:26 20 meet and greet of mine and I met him in person.

10:03:30 21 Q And that was sometime in 2022?

10:03:35 22 A No. It was before that, but I don't remember

10:03:36 23 exactly when that was.

10:03:39 24 Q All right. Where was the meet and greet?

10:03:40 25 A In Houston.

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10:03:41 1 Q Okay. And where in Houston? Where did this
10:03:46 2 happen? Like, at a restaurant or hotel?
10:03:47 3 A I had booked a location. I had booked a
10:03:51 4 Airbnb.
10:03:52 5 Q Okay. And is it, like, a party or?
10:03:56 6 A It's like a meet and greet for fans.
10:03:58 7 Q Okay. And do you recall how many people were
10:04:01 8 there?
10:04:02 9 A I don't.
10:04:03 10 Q Was it more than a thousand?
10:04:05 11 A No. It was less than 20.
10:04:07 12 Q Less than 20. Okay.
10:04:08 13 A Uh-huh.
10:04:09 14 Q And -- all right. So you met Mr. Ray at
10:04:13 15 this thing. And then when you met him, did that -- the
10:04:15 16 issue of a possible internship come up right then?
10:04:18 17 A Not at all.
10:04:19 18 Q When you met him, did you have any sense of
10:04:21 19 what -- what he did or what his interest was besides
10:04:24 20 being a fan of your show?
10:04:25 21 A No.
10:04:27 22 Q Is there any particular reason you thought of
10:04:29 23 him as a candidate to be an intern?
10:04:32 24 A No. He asked me, and he had been around --
10:04:37 25 Q Okay.

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10:04:37 1 A -- for a while as a fan, engaging in the
10:04:40 2 comment section. And I felt like maybe I'll give him a
10:04:44 3 chance.

10:04:45 4 Q Did you have any understanding of what --
10:04:46 5 like, did he have any particular knowledge or skills?
10:04:50 6 Was he an expert in something? Or, like, what did you
10:04:53 7 think he was going to bring to the table?

10:04:55 8 A So what I did was I went and printed out
10:04:57 9 different papers that listed my expectations and how I
10:05:02 10 wanted things to look on my platform. I went and sat
10:05:06 11 down with him. I met him for lunch at a steakhouse, and
10:05:10 12 I presented him with these things. And I said, "We'll
10:05:12 13 see if you can perform in a way that is satisfactory to
10:05:18 14 me," and it did not happen that way.

10:05:20 15 And so that's why, fairly quickly, I said,
10:05:21 16 "This isn't going to work," and I went back to doing it
10:05:24 17 myself. It was a very short amount of time.

10:05:27 18 Q What would you say the whole soup to nuts --
10:05:28 19 how long was he around? Less than a month?

10:05:31 20 A No more than a month, I would say.

10:05:33 21 Q And what -- is it fair to say what he was
10:05:35 22 going to help you with was, like, production values? Or
10:05:38 23 it was going to be more than that?

10:05:40 24 A I was going to be -- to post to Instagram on
10:05:42 25 my Instagram blog.

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10:05:49 1 Q All right. So the expectations were he was
10:05:51 2 going to kind of keep track of everything you are doing
10:05:53 3 and make sure it got -- it got posted to Instagram?
10:05:56 4 A I just needed him to post trending topics
10:05:58 5 and -- and new stories on Instagram.
10:06:01 6 Q And that would be under your Instagram
10:06:04 7 account?
10:06:05 8 A Yes. My blog page, not my personal.
10:06:07 9 Q Your blog page.
10:06:08 10 And did he have his own Instagram account or
10:06:10 11 blog page?
10:06:11 12 A Yes.
10:06:11 13 Q What was his -- what do you call it -- handle?
10:06:14 14 Name?
10:06:15 15 A I'm not certain what his handle was.
10:06:19 16 Q Do you follow him on social media?
10:06:21 17 A I do not.
10:06:22 18 Q Did you back then?
10:06:22 19 A Yes.
10:06:23 20 Q Okay. And at some point, you unfollow him
10:06:25 21 when he didn't work out?
10:06:27 22 A I unfollowed him based on a -- a disagreement.
10:06:32 23 Q All right. What was that?
10:06:37 24 A He was a very active member of the comment
10:06:41 25 section. As a fan, he was just very active. And I

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10:06:44 1 didn't see him for a while. I had his personal phone
10:06:48 2 number; so I called to check on him. He did not answer.
10:06:53 3 This went on for weeks.

10:06:56 4 Eventually, I called his job, and I said,
10:06:59 5 "Hey, is" -- I tried to book an appointment. He was at
10:07:04 6 Paul Mitchell doing hair. So I said, "Can I book an
10:07:07 7 appointment with Mike?"

10:07:08 8 And the woman said, "Sure." And that's when I
10:07:10 9 knew he was alive and okay.

10:07:11 10 So I said, "Okay."

10:07:12 11 So I just hung up the phone. And so that was
10:07:14 12 my issue with him -- that I was trying to check on him,
10:07:17 13 and that he wasn't answering. And so, when we got back
10:07:21 14 in contact, he said that he was going through something,
10:07:22 15 and he apologized.

10:07:27 16 Q All right. So at the time -- so -- so what
10:07:32 17 was the disagreement?

10:07:34 18 A That he had been a very active person and
10:07:36 19 had -- he was supposed -- he was still someone who was
10:07:39 20 adding to the space and coming and giving information.
10:07:42 21 And, when he disappeared, I was worried because this is
10:07:47 22 someone that I have a positive exchange with at this
10:07:49 23 point. It's been years at this point that I've known
10:07:52 24 him.

10:07:52 25 So I've been to his home, like I told you. We

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10:07:54 1 went out to lunch. So, when he didn't answer, I was
10:07:57 2 worried about him. So I was upset because I felt like
10:08:00 3 he could have just let me know that he was okay.

10:08:03 4 Q All right. So the disagreement was that he
10:08:05 5 stopped being so active on social media and the ones
10:08:08 6 that you were in together?

10:08:09 7 A My -- my disagreement was that he was
10:08:11 8 seemingly missing to me. I was concerned for his
10:08:14 9 safety. He was so active that when he wasn't, I thought
10:08:17 10 something happened to him.

10:08:19 11 Q Okay. Are there other fans who you had that
10:08:22 12 level of concern for, where you would go like call their
10:08:26 13 job and see if they're around?

10:08:28 14 A Not call their job, but I've had a fan that I
10:08:30 15 took groceries to because he was fired from his job for
10:08:32 16 stealing food. I literally, personally purchased
10:08:35 17 groceries and took them to his home, because he had come
10:08:38 18 to a meet and greet of mine, and I -- I thought he was
10:08:41 19 nice. He was active in my community as well.

10:08:45 20 Yes, I have done -- yes, I've looked out.

10:08:48 21 Q Okay. And -- and -- how did it -- I don't
10:08:56 22 know if I'm confusing this.

10:08:58 23 So Michael Ray -- he is the one he was going
10:08:59 24 to do some things, post to the Instagram. It was -- it
10:09:02 25 was less than a month before you figured out it wasn't

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10:09:04 1 going to work; right?

10:09:05 2 A Right.

10:09:06 3 Q And then how does that tie into all this other
10:09:08 4 stuff about looking for him and checking if he is okay?

10:09:12 5 A Well, you asked me about following him, and I
10:09:14 6 explained to you why I unfollowed him. It had nothing
10:09:17 7 to do with him working for me. Just as a person who
10:09:19 8 felt like he may have been in trouble. He was very
10:09:21 9 active. So, once I saw he wasn't, I got concerned.

10:09:25 10 Q Okay. And what's the -- what's the time -- in
10:09:27 11 other words, did he -- did he intern for you first, and
10:09:32 12 then he kind of disappeared or?

10:09:36 13 A The internship happened first, and then this
10:09:38 14 incident I'm telling you about is years later.

10:09:42 15 Q Okay. So he was an intern, and he left on not
10:09:45 16 great terms; right?

10:09:47 17 A No. We were still fine.

10:09:48 18 Q Oh, you were fine.

10:09:49 19 He just wasn't good at what you needed him to
10:09:51 20 do?

10:09:51 21 A Yeah. Right, right.

10:09:52 22 Q So you said, "This isn't going to work"?

10:09:54 23 A Right.

10:09:55 24 Q "But let's stay friends"?

10:09:56 25 A Yeah.

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10:09:56 1 Q And he continued to be on your social media?

10:09:58 2 A Right. And he was very active.

10:09:59 3 So when you asked me, well, why did I unfollow

10:10:02 4 him. It was because I was worried about him.

10:10:05 5 Q Okay. And are you still in touch with

10:10:11 6 Mr. Ray?

10:10:12 7 A No.

10:10:13 8 Q Okay. Is there a reason you stopped being in

10:10:18 9 touch with him?

10:10:19 10 A The reason that I just gave. I just feel like

10:10:22 11 it was very inconsiderate to not at least say, "I'm

10:10:26 12 okay." I made it very clear that I was just concerned

10:10:28 13 for his well-being, and I just felt like, you know, I

10:10:31 14 don't want to be in this situation again. So let's just

10:10:34 15 keep it how things are. No contact.

10:10:39 16 Q And what did he say?

10:10:41 17 A He wrote me multiple times. He text me,

10:10:43 18 begging to speak to me. He asked for forgiveness. He

10:10:46 19 said he was sorry.

10:10:50 20 Q And how would you -- was there anything

10:10:52 21 romantic in that relationship?

10:10:53 22 A Absolutely not. He is homosexual.

10:10:55 23 Q And -- and the -- the thing that took it apart

10:11:01 24 was that he didn't check in with you, and you -- you

10:11:06 25 were offended by that?

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10:11:08 1 A I wouldn't call us friends, but I thought that
10:11:10 2 we had enough history that if I was calling to see if he
10:11:14 3 was okay, that he would be considerate enough to say,
10:11:17 4 "I'm okay." An extended period of time went by where I
10:11:20 5 didn't know what may have -- I didn't know anything. I
10:11:22 6 was just concerned.

10:11:23 7 Q Okay. But after all that, he wrote you. He
10:11:26 8 apologized profusely and said, "I'm sorry"?

10:11:29 9 A And I said, "That's okay, but I don't wish to
10:11:31 10 build" --

10:11:31 11 Q But we're done?

10:11:32 12 A -- "further." Right.

10:11:34 13 Q Okay. Other social media that you are on that
10:11:46 14 we haven't talked about?

10:11:49 15 A I think we've gone over all of them.

10:11:52 16 Q Discord -- does that count as social media?

10:11:56 17 A I'm not sure how Discord is.

10:11:59 18 Q What is it?

10:12:00 19 A It's -- I would describe it as a community
10:12:04 20 server. A community server.

10:12:06 21 Q Okay. Server like a computer server. Like --
10:12:10 22 or?

10:12:11 23 A They use the term "server." I don't know.

10:12:14 24 Q How did you -- how long have you been using
10:12:15 25 that -- Discord?

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10:12:20 1 A Maybe 2018, 2019-ish. It's been a while.

10:12:27 2 Q And -- and what do you do with Discord?

10:12:31 3 Obviously, it's a broad period. But starting in 2019,
10:12:34 4 how have you used that as part of your social media?

10:12:37 5 A Discord is a space for my community to be able
10:12:39 6 to speak when I'm not live. I use it in the hopes of a
10:12:45 7 bonding tool; so --

10:12:49 8 There are chats for gardening, working out,
10:12:56 9 prayer. Sometimes we watch things together because you
10:13:00 10 can stream. Music videos. When I said, "watch things
10:13:05 11 together," things that would get you a copyright strike
10:13:08 12 on YouTube or Twitch. So music videos and things of
10:13:10 13 that nature that would get a copyright strike.

10:13:13 14 I can't -- I can't stream a music video and
10:13:15 15 give my opinion there; so I would say, "Let's go to
10:13:17 16 Discord." And we'll watch the music video there so we
10:13:21 17 can all see it and hear it, and then you have to go back
10:13:24 18 to the other platform and talk about how you want it.

10:13:26 19 Q You said there's channels for gardening and
10:13:28 20 these things. Those are within your --

10:13:31 21 A Yes.

10:13:31 22 Q -- community. Or it's more general?

10:13:33 23 A A Discord server begins blank. It's a blank
10:13:37 24 canvas.

10:13:38 25 Q Okay.

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10:13:38 1 A So you create everything about it; so I
10:13:40 2 personally created those rooms.

10:13:42 3 Q Okay. So -- so if we were to compare it to a
10:13:45 4 physical space, in your Discord world, there's a room
10:13:48 5 that's gardening. There's a room that's --

10:13:50 6 A Right. If it were this building, this would
10:13:53 7 be a gardening room, across the hall would be a room for
10:13:56 8 people to talk about sports. There would be another
10:13:59 9 room for people to pray and give words of encouragement.
10:14:01 10 There would be a room where people can talk on the
10:14:03 11 phone.

10:14:04 12 Q Okay. And you set up the rooms?

10:14:06 13 A Yes.

10:14:07 14 Q And what is this whole place called?

10:14:10 15 A At this time it's called "MobzWorld," M-O-B-Z.
10:14:15 16 MobzWorld.

10:14:16 17 Q And, like, today, how many people visit that
10:14:21 18 or -- is it -- how do you measure the popularity of
10:14:26 19 that?

10:14:26 20 A They allow you to see how many people are a
10:14:29 21 part of your community.

10:14:31 22 Q Okay. And so, in MobzWorld, on Discord, how
10:14:35 23 many people are part of your community now?

10:14:37 24 A I would say maybe 3500. It's 3000-something.

10:14:41 25 Q And what was it back in 2019?

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10:14:44 1 A Much smaller. Maybe 20 people. Maybe 50
10:14:51 2 people. Something like that. Very small.

10:14:53 3 Q All right. And you said one of the utilities
10:14:57 4 of -- of Discord is if there's something copyrighted
10:15:02 5 that you want to look at to talk about, if you did it on
10:15:04 6 Twitter, or one of these other ones, you would get a
10:15:06 7 copyright strike?

10:15:08 8 A Right.

10:15:08 9 Q And -- and tell me what's your understanding
10:15:10 10 of what a copyright strike is?

10:15:12 11 A A copyright strike is the person doesn't want
10:15:17 12 you using their content in your video.

10:15:20 13 Q So how -- how does that present itself to you?

10:15:25 14 A So --

10:15:26 15 Q Have you had one?

10:15:27 16 A A copyright strike? I believe so.

10:15:31 17 Q So tell me what you think it is? Like, what
10:15:34 18 happens? You post?

10:15:35 19 A So what happens is that I would be streaming,
10:15:37 20 and the system -- YouTube system would -- however they
10:15:41 21 detect these things -- would say, "Hey, you have" --
10:15:43 22 they would send me an email. You have copyrighted
10:15:45 23 material in your video.

10:15:47 24 Sometimes they would say, because you are not
10:15:48 25 monetized, there's no effect. You can keep it.

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10:15:51 1 Sometimes the owner doesn't want it used at
10:15:53 2 all so you go and mute the audio, and you can keep your
10:15:56 3 video up. That's basically it.

10:15:59 4 Q Okay. And -- but when they send you that
10:16:07 5 message, they're also disabling the underlying content;
10:16:10 6 right?

10:16:11 7 A It depends on the copyright owner.

10:16:13 8 Q Okay.

10:16:13 9 A They get to decide.

10:16:14 10 Q All right. But -- but whatever it is that
10:16:17 11 happens there, it's better for you to send people to
10:16:21 12 Discord where you can watch it without it getting
10:16:24 13 copyright?

10:16:25 14 MS. DIXON: Objection. Assumes facts not in
10:16:26 15 evidence.

10:16:26 16 MR. O'SULLIVAN: Okay. Well, I just want to
10:16:26 17 know exactly how it works.

10:16:26 18 BY MR. O'SULLIVAN:

10:16:29 19 Q So -- so I think you told me that one use of
10:16:31 20 Discord is it's a place we can look at content that
10:16:34 21 might create a copyright strike over here; is that
10:16:37 22 correct?

10:16:38 23 A Yes.

10:16:39 24 Q Okay. And what's an example of something you
10:16:41 25 would look at on Discord to avoid this copyright strike

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10:16:44 1 issue?

10:16:45 2 A Okay. So Beyonce came up with a music video
10:16:51 3 today, and it was a topic on my show on YouTube, so I
10:16:54 4 got to talk about it, but we want to hear the song, and
10:16:57 5 we want to watch the video.

10:16:59 6 Beyonce, more than likely, is going to flag
10:17:02 7 that and make you trim out that whole segment of your
10:17:04 8 video; so now the integrity of your video is affected.
10:17:07 9 You don't want that.

10:17:08 10 So, later on, as we're bonding, chilling,
10:17:11 11 "Hey, did you guys want to watch that Beyonce video"?

10:17:13 12 "Sure."

10:17:14 13 Watch the video.

10:17:18 14 Q All right. So -- so what I'm trying to
10:17:21 15 understand is, is what's the timing? In other words, do
10:17:25 16 you talk for a while on your other social medias that
10:17:29 17 may have this copyright issue. And then say, "Hey, go
10:17:32 18 to Discord and look at this" and then come back and
10:17:34 19 talk?

10:17:35 20 A No. Discord is just a community space that
10:17:37 21 runs on its own, based on the members. That happens
10:17:40 22 sporadically. Come in come out. It's literally at
10:17:44 23 people's leisure when they want to.

10:17:45 24 So it's not scheduled. It's not "Hey, I
10:17:48 25 talked about this today, so now I'm going to Discord to

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10:17:50 1 do this." No. No.

10:17:52 2 Q Right. But -- but the -- is the -- is the --
10:17:54 3 what you are trying to do for the fans saying, "You can
10:17:58 4 come talk to me about this late-breaking video. We're
10:18:01 5 going to talk about it. If you need to see it, to
10:18:05 6 understand what we're talking about, go over here"?

10:18:07 7 A No.

10:18:07 8 Q Tell me in your words what's the point of
10:18:09 9 having the music video on Discord and the conversation
10:18:12 10 on one of these other social media?

10:18:14 11 A So I'm a music lover. STATIONHEAD is a radio
10:18:17 12 hosting platform. All the streams count towards
10:18:20 13 billboard. So music is a big part of Mob Radio. It's a
10:18:24 14 big part of what I do.

10:18:26 15 So I actually have plug-ins. People can play
10:18:28 16 music on here. So it's not a "I talked about this; so
10:18:31 17 let's go here." Simply because I cannot -- I don't have
10:18:35 18 that freedom on YouTube.

10:18:36 19 If I am in this space and it comes up, we may
10:18:39 20 watch a music video -- is what I'm saying. Or if there
10:18:42 21 was a topic that people are talking about, and there's
10:18:45 22 an opportunity at that point, "Hey, y'all want to watch
10:18:47 23 it?" Then we'll watch it. It's not a orchestrated
10:18:49 24 thing like that. No. It's not an extension of my show
10:18:52 25 in any way.

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10:18:52 1 Q Okay. I understand it's not orchestrated.

10:18:54 2 But -- but just the basic -- we're talking about

10:18:57 3 something that you -- you think you can't put up on

10:18:59 4 YouTube, right, because it's going to get one of these

10:19:02 5 strikes?

10:19:03 6 A No.

10:19:04 7 Q So explain it to me in your words. I want to

10:19:07 8 understand why you use Discord as part of this to post a

10:19:11 9 music video in the case you gave me -- Beyonce.

10:19:14 10 A No. What I'm telling you is Discord is a

10:19:16 11 community space, and so it's -- it's a hangout, so to

10:19:19 12 speak. So what I'm telling you, we may watch things.

10:19:21 13 You can use channels for different things.

10:19:23 14 So I'm just telling you that, when I'm

10:19:26 15 present, that -- okay. I may play a music video when I

10:19:28 16 come in. I want to talk about something; so I may play

10:19:31 17 a music video. I may listen to music. They have movies

10:19:34 18 on YouTube. We may watch a YouTube movie.

10:19:37 19 So it's not about -- I was copyrighted so I

10:19:38 20 want to go Discord to show something. No. 'Cause I

10:19:40 21 don't get a negative effect on YouTube.

10:19:43 22 Q All right. I'm misunderstanding. I thought

10:19:45 23 we started this whole thing with you saying some things

10:19:48 24 go on Discord because on YouTube, I'll get a copyright

10:19:52 25 strike; right?

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10:19:53 1 A It's possible. Yeah.

10:19:54 2 Q And that Discord was the solution to that.

10:19:57 3 You are not going to get a copyright strike on

10:20:00 4 Discord; right?

10:20:02 5 MS. DIXON: Assumes facts not in evidence.

10:20:04 6 MR. O'SULLIVAN: I'm asking her for her

10:20:05 7 experience.

10:20:06 8 MS. DIXON: Objection. Calls for speculation.

10:20:06 9 MR. O'SULLIVAN: No, it isn't.

10:20:06 10 MS. DIXON: Speculation on her part as to what

10:20:10 11 YouTube is going to do.

10:20:13 12 BY MR. O'SULLIVAN:

10:20:14 13 Q I just want your experience.

10:20:15 14 MS. DIXON: And it calls for a legal opinion.

10:20:17 15 MR. O'SULLIVAN: Counsel.

10:20:18 16 MS. DIXON: Objection. Calls for a legal

10:20:20 17 opinion.

10:20:20 18 MR. O'SULLIVAN: Okay.

10:20:20 19 And you just need to say, "Objection." If I

10:20:22 20 need the basis, I'll ask you.

10:20:24 21 MS. DIXON: I think I do have to give the

10:20:25 22 basis, like relevance and --

10:20:27 23 MR. O'SULLIVAN: No you don't. Some people

10:20:27 24 call that --

10:20:28 25 MS. DIXON: You can't just object and not say

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10:20:28 1 what it is. I didn't say speaking. I'm just saying
10:20:31 2 calls for a legal opinion. I didn't justify it. That's
10:20:35 3 the basis of the objection.

10:20:37 4 MR. O'SULLIVAN: Okay.

10:20:37 5 BY MR. O'SULLIVAN:

10:20:38 6 Q I don't need a legal opinion from you.

10:20:40 7 I want to understand in the situation you told
10:20:43 8 me with the Beyonce video on Discord and a conversation
10:20:47 9 coming -- going on with you and your fans on another
10:20:50 10 channel, why are you doing it that way instead of just
10:20:53 11 putting it all together on YouTube in one place?

10:20:57 12 A Because by the time I'm on Discord, I'm not
10:20:59 13 working anymore. I'm trying to relax and see my -- I
10:21:05 14 actually get to know my community and hear what they
10:21:07 15 have to say, so this is not a show.

10:21:11 16 I routinely say Discord is not about me.
10:21:13 17 That's why it's MobzWorld. It's for the people. So
10:21:16 18 it's just about trending -- what's going on. People
10:21:19 19 talk about their own personal lives.

10:21:21 20 So it's not because YouTube doesn't let me
10:21:24 21 do something I go to Discord. No. I'm just telling
10:21:27 22 that you I don't know these people personally; so the
10:21:29 23 only thing that they can -- the only place they can meet
10:21:31 24 me is what I talked about on my show. So show topics
10:21:34 25 may come up -- is what I'm saying.

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10:21:36 1 Q Uh-huh.

10:21:37 2 A Right.

10:21:37 3 Q But we got in this whole thing because of the
10:21:39 4 copyright problem.

10:21:40 5 You brought it up; right?

10:21:42 6 A I gave you an example of something.

10:21:44 7 Q All right. I'm just trying to stay with that
10:21:46 8 example.

10:21:46 9 A Okay.

10:21:47 10 Q Is it your understanding that there are
10:21:48 11 different rules on what you can do with copyrighted
10:21:52 12 material on Discord versus other social media platforms?

10:21:56 13 A Yes.

10:21:57 14 Q Okay. And the rules are, looser on Discord,
10:22:00 15 would you say?

10:22:03 16 A I wouldn't say looser. I think because of the
10:22:06 17 benefit that artists get from YouTube 'cause they make
10:22:09 18 money on those videos and stuff like that, that's why
10:22:11 19 they're more strict. On Twitch, I also play music
10:22:14 20 videos that YouTube may copyright. So -- it just
10:22:18 21 depends on the platform.

10:22:20 22 But every platform has rules. Somebody could
10:22:22 23 report the Discord, so every platform has rules.

10:22:26 24 Q Uh-huh. But your understanding is the chances
10:22:32 25 that you are going to get in trouble on copyright

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10:22:34 1 grounds on Discord are lower than on YouTube; right?

10:22:37 2 A No.

10:22:38 3 Q No?

10:22:39 4 A No. Because you can't speak for what someone
10:22:42 5 else may do. Somebody may flag you.

10:22:44 6 Like, I told you one of my pages was falsely
10:22:46 7 flagged and suspended. So, no, I didn't have the
10:22:49 8 confidence that it wasn't possible. Of course, it can
10:22:52 9 happen.

10:22:52 10 Q You didn't treat it as just a workaround for
10:22:54 11 something you knew you couldn't do. You couldn't put it
10:22:56 12 up on YouTube so it wasn't --

10:22:57 13 A Right. No. It wasn't at all. No.

10:23:00 14 Q Okay. And -- and you said your -- your social
10:23:02 15 media was suspended.

10:23:03 16 Which account was that?

10:23:05 17 A My Twitter. I've had Twitter and Instagram
10:23:07 18 suspended.

10:23:09 19 Q Are they currently suspended -- either of
10:23:11 20 them?

10:23:12 21 A My Twitter is currently suspended.

10:23:14 22 Q And what were the stated grounds for that?
10:23:16 23 What was the reason they gave?

10:23:22 24 A Evasion, I believe.

10:23:23 25 Q Evasion?

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10:23:24 1 A Yeah. That's when you make another Twitter
10:23:26 2 after one has been suspended.
10:23:28 3 Q Okay. Is that the word they use -- "evasion"?
10:23:34 4 A I believe so.
10:23:36 5 Q And was that true of you? Had you had a
10:23:38 6 previous account suspended, and you made a new one?
10:23:41 7 A Yes, I had a previous account suspended.
10:23:44 8 Q And that previous account did have a different
10:23:49 9 name than -- than the more recent one?
10:23:53 10 A Yes.
10:23:53 11 Q Okay. And what was the reason -- and was that
10:23:59 12 the first time your Twitter account got suspended?
10:24:02 13 A No.
10:24:04 14 Q All right. What's the first time your Twitter
10:24:05 15 account got suspended? What year?
10:24:07 16 A I don't recall.
10:24:09 17 Q Best you can estimate? Was it 1940?
10:24:13 18 A No. I wasn't alive.
10:24:15 19 Q This is --
10:24:16 20 A 2020 possibly.
10:24:17 21 Q Okay. And how long had you been on Twitter at
10:24:20 22 that point?
10:24:21 23 A Since 2010.
10:24:22 24 Q Okay. And 2020 was the first time your
10:24:26 25 Twitter, what, gets taken down? Literally suspended?

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10:24:29 1 A That's the first time I recall.

10:24:31 2 Q Okay. And what was the stated reason back

10:24:32 3 then?

10:24:33 4 A I don't recall.

10:24:35 5 Q Were you bothered?

10:24:38 6 A That my page was deleted.

10:24:39 7 Q Yeah.

10:24:40 8 A I was frustrated, yes.

10:24:42 9 Q And did you try to understand why -- that they

10:24:44 10 were able to do that to you?

10:24:48 11 A At the time, I'm sure I did. Uh-huh.

10:24:52 12 Q And sitting here, you can't recall why they

10:24:54 13 suspended your account?

10:24:55 14 A No. Because I get harassed a lot; so it's --

10:24:59 15 it's always something that doesn't make sense.

10:25:02 16 Q Whether it makes sense or not, you can't even

10:25:04 17 remember the reason they told you your account is

10:25:06 18 suspended?

10:25:08 19 A No. For example, I've gotten an account

10:25:10 20 suspended, and I didn't get a follow-up email; so I had

10:25:13 21 no idea why, and I had no nobody to contact. So there's

10:25:16 22 some instances where I don't know.

10:25:17 23 There was -- my latest Twitter got suspended.

10:25:19 24 They claimed I was impersonating myself. I tried to

10:25:23 25 reach out, I hit a brick wall; so --

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10:25:28 1 Q So the words I'm hearing here "impersonating"
10:25:30 2 and "invasion," they all seem like dishonesty words.

10:25:35 3 Is that what they were saying? That you were
10:25:36 4 misleading people by --

10:25:36 5 A Well --

10:25:37 6 MS. DIXON: Calls for speculation about what
10:25:38 7 they were saying.

10:25:39 8 THE WITNESS: 'Cause I could explain to you
10:25:40 9 what the -- the situation is, I had my face on Instagram
10:25:44 10 on my profile picture, and I was verified there. I was
10:25:48 11 not verified on Twitter. So I had my personal picture
10:25:51 12 in my avi on Twitter.

10:25:56 13 (The Court Reporter requested clarification.)

10:25:57 14 THE WITNESS: Avi, A-V-I. That's what they
10:25:57 15 call the profile picture. It was a picture of myself.

10:26:01 16 And from me being harassed, fans went on
10:26:05 17 Twitter -- Megan Pete fans. Because they publicly said
10:26:08 18 this, they went and reported my Twitter for
10:26:11 19 impersonation of my verified Instagram. That should
10:26:14 20 have never happened; so it should have never been
10:26:17 21 suspended. It was suspended for me impersonating myself
10:26:20 22 because I wasn't verified on Twitter.

10:26:21 23 So they said, "She's not the real
10:26:23 24 Milagro Gramz," and they got my page deleted. So I made
10:26:27 25 another one, and they said, "You evaded it."

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10:26:29 1 I'm continuously saying, "You will not follow
10:26:30 2 up with me." I sent my license. I sent my trademarks.
10:26:33 3 I tried to talk to them for months.

10:26:36 4 So the words "invader" and "impersonation"
10:26:39 5 were used, but in understanding why, it's not really
10:26:42 6 anything substantial or my wrongdoing.

10:26:50 7 BY MR. O'SULLIVAN:

10:26:51 8 Q Are any of the suspensions of your -- of your
10:26:58 9 Twitter or your Insta for reasons that you do
10:27:00 10 understand? Do you know why they did it? And you agree
10:27:03 11 you did whatever it is those suspended you for?

10:27:05 12 A I do not agree.

10:27:06 13 Q And whatever the reasons were, in each case,
10:27:09 14 you say they were wrong?

10:27:10 15 A At no point in time have I agreed. No.

10:27:12 16 Q Okay. So I'm going to go back.

10:27:14 17 In the beginning, we talked about making it
10:27:15 18 easier for the court reporter; so you have to let me
10:27:17 19 finish me question.

10:27:18 20 A Okay.

10:27:18 21 Q And just leave a little space for her to catch
10:27:20 22 up.

10:27:20 23 A Of course.

10:27:21 24 Q And then -- have you made any attempt to
10:27:29 25 understand what the rules are, say, on Twitter, in terms

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10:27:32 1 of what you can and can't do?

10:27:38 2 A Yes.

10:27:38 3 Q All right. And did you -- how did you do
10:27:40 4 that? How did you figure out what's going to get you
10:27:43 5 suspended or not on Twitter?

10:27:45 6 A When I have gotten an email with an issue,
10:27:49 7 I've looked into that particular situation. They have
10:27:52 8 links that you can follow.

10:27:55 9 In a broad way, looking at all of their
10:27:57 10 things? No. I don't know all their policies and stuff
10:28:00 11 like that. I just know what they come to me with, and
10:28:03 12 I've looked into that.

10:28:03 13 Q Okay. So give me everything that you can
10:28:05 14 remember about that.

10:28:06 15 What's an example of an email you got from a
10:28:08 16 social media platform that said, "You are going to be
10:28:11 17 suspended for X," and you looked into it and got to the
10:28:14 18 bottom of it? What's an issue they raised for you?

10:28:17 19 A Okay. The impersonation. I received an email
10:28:19 20 saying that my Twitter was suspended for impersonation.
10:28:23 21 That avi was myself; so I knew that they were accusing
10:28:26 22 me of impersonating myself. They said, "If you think we
10:28:30 23 made a mistake, follow up with us."

10:28:31 24 And they have different verification tools.
10:28:34 25 They may ask you to write a number on a piece of paper

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10:28:36 1 and take a picture with it. They have different things.
10:28:39 2 I can't recall all the different methods, but that's
10:28:42 3 what I've done.
10:28:43 4 I sent them an email with my license. I sent
10:28:46 5 emails with my trademarks. I explained to them I own my
10:28:49 6 likeness, this is me. I'm not impersonating myself.
10:28:52 7 Can I speak to someone. And I went and read the rules
10:28:55 8 on it at the time, and I didn't qualify.
10:29:03 9 Q You didn't qualify?
10:29:04 10 A For suspension.
10:29:05 11 Q For suspension. And ultimately was the
10:29:07 12 suspension lifted?
10:29:08 13 A No. Because I never got a response.
10:29:11 14 Q And, at some point, you just said -- gave up?
10:29:14 15 A I just gave up. Yeah.
10:29:15 16 Q Oh. Okay.
10:29:16 17 And when -- when was the last time you had an
10:29:19 18 active Twitter account?
10:29:23 19 A I -- I have an active Twitter now.
10:29:26 20 Q Okay. The suspension we've been talking
10:29:28 21 about, the impersonation -- that's on Instagram?
10:29:31 22 A No. That was Twitter. Twitter got suspended
10:29:34 23 for impersonation, and then I made another one.
10:29:37 24 Q Okay. And is that -- did that one get
10:29:40 25 suspended?

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10:29:41 1 A Very recently, yeah. It got suspended.

10:29:44 2 Q And what were the grounds that they stated as

10:29:47 3 the reason you were suspended very recently?

10:29:50 4 A Evading suspension.

10:29:51 5 Q Evading suspension?

10:29:52 6 A Yeah. From the impersonation.

10:29:55 7 Q So you got impersonation, evading?

10:29:59 8 A Yeah. When Twitter suspends you, you are not

10:30:01 9 supposed to make another Twitter account.

10:30:05 10 Q And how did you know that?

10:30:08 11 A Once they told me that in that email.

10:30:11 12 Q All right. So you got suspended. You made a

10:30:13 13 new account. They sent you an email saying, "We know

10:30:15 14 you just made a new account. You are still suspended"?

10:30:18 15 A It was reported and then -- 'cause I had the

10:30:20 16 Twitter account for a while. It was mass reported.

10:30:23 17 Q All right. So what was the -- what was the

10:30:24 18 handle on the old Twitter -- the suspended one and the

10:30:27 19 new one?

10:30:29 20 A There were variations of Milagro Gramz. I

10:30:31 21 don't know exactly what they were.

10:30:33 22 Q What's your current one?

10:30:36 23 A It got suspended. It was the Milagro Gramz.

10:30:39 24 It was -- or maybe MobzWorld. I'd have to look. It was

10:30:42 25 a variation of either Milagro Gramz or MobzWorld.

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10:30:45 1 Q All right. How many times have you, total,
10:30:47 2 been suspended from social media platform?
10:30:51 3 A Two or three.
10:30:52 4 Q And it's all on Twitter?
10:30:54 5 A One of my Instagram pages was suspended and
10:30:57 6 reinstated. And my blog page has been suspended before.
10:31:02 7 Q How many times? Just the blog.
10:31:09 8 A The blog, I believe, one time.
10:31:12 9 Q And what was the stated reason?
10:31:15 10 A I don't know why it got suspended.
10:31:18 11 Q Did they give you a reason?
10:31:20 12 A I don't recall.
10:31:21 13 Q Okay. And that, you said it was just one
10:31:24 14 time, and there was a reason. You can't remember.
10:31:26 15 A Right.
10:31:26 16 Q And was it ultimately reinstated?
10:31:28 17 A No. I had to start fresh, and that's the one
10:31:31 18 I have now.
10:31:33 19 Q So rather than resolving whatever got you
10:31:35 20 suspended, you just created a new account?
10:31:38 21 A Yeah.
10:31:38 22 Q Or a new blog?
10:31:39 23 A Yes.
10:31:40 24 Q All right.
10:31:40 25 Now, what about Instagram? How many times

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10:31:42 1 have you been suspended there?

10:31:43 2 A Only once, I believe.

10:31:45 3 Q And did you undue the suspension or just

10:31:48 4 create a new account?

10:31:49 5 A I responded to their email, and way later,

10:31:55 6 they reinstated it.

10:31:58 7 Q So how long were you suspended on Instagram?

10:32:02 8 A I don't know how long I was without that page,

10:32:03 9 honestly.

10:32:06 10 Q More than a year?

10:32:08 11 A I don't believe it's more than a year, though.

10:32:10 12 Q Several months?

10:32:10 13 A But it was a while. Yes, yes. It was an

10:32:13 14 extended period of time.

10:32:15 15 Q And can you recall the stated reason?

10:32:16 16 A No. I don't know why. And they gave it back.

10:32:20 17 That's the one I have now.

10:32:21 18 Q Several months later?

10:32:22 19 A Yeah.

10:32:23 20 Q And -- okay. So I have the blog, I have

10:32:27 21 Instagram.

10:32:27 22 And then Twitter you said, what, three total

10:32:30 23 suspensions?

10:32:31 24 A I don't know how many times I've been

10:32:32 25 suspended on Twitter. But I mean, I would say about two

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10:32:35 1 or three.

10:32:36 2 Q Okay. And I heard impersonation, evasion.

10:32:42 3 And what was the other one?

10:32:44 4 A That was it.

10:32:45 5 Q And -- and one of those two was the
10:32:48 6 explanation they gave for each of your suspensions on
10:32:51 7 Twitter?

10:32:52 8 A Yes.

10:32:52 9 Q Okay. And, in the case of Twitter, did you
10:33:01 10 resolve any of the suspensions with them, meaning they
10:33:04 11 took it back? Or, in each case, after a suspension, you
10:33:07 12 just created a new account?

10:33:10 13 A I would attempt -- I didn't resolve anything
10:33:12 14 with them. I would try, and then I would make a new
10:33:14 15 one.

10:33:14 16 Q Okay. All right. So, for whatever Twitter
10:33:16 17 said about suspending your account, none of those ever
10:33:19 18 got to the bottom of it?

10:33:20 19 A No.

10:33:20 20 Q Okay. You -- but you got to be back on
10:33:21 21 Twitter just by using a new name?

10:33:23 22 A Yeah.

10:33:24 23 Q Okay. And how did your people know about
10:33:27 24 that? You just said, "I have a new Twitter"?

10:33:29 25 A Yes.

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10:33:33 1 Q Okay.

10:33:35 2 MS. DIXON: Excuse me. When it is convenient,

10:33:35 3 I need to take a bio break.

10:33:40 4 MR. O'SULLIVAN: Okay. We can do that right

10:33:41 5 now.

10:33:41 6 THE VIDEOGRAPHER: The time is 10:33. We're

10:33:44 7 going off the record.

10:33:47 8 (Recess was taken.)

10:33:47 9 THE VIDEOGRAPHER: The time is 10:55. We're

10:55:02 10 back on the record.

10:55:08 11 MR. O'SULLIVAN: Thank you.

10:55:09 12 Can you read me back the last question. Or

10:55:13 13 just the last answer.

10:55:14 14 (The following record was read:

10:55:14 15 "QUESTION: Okay. And how did your people

10:55:14 16 know about that? You just said, 'I have a

10:55:14 17 new Twitter'?

10:55:14 18 "ANSWER: Yes.")

10:55:34 19 BY MR. O'SULLIVAN:

10:55:34 20 Q Okay. Any other social media presence we

10:55:36 21 haven't talked about?

10:55:37 22 A I don't believe so.

10:55:38 23 Q Okay. Any other suspensions from social media

10:55:41 24 that we haven't talked about?

10:55:42 25 A No.

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10:55:43 1 Q Okay. Have you ever had any interaction with
10:55:46 2 the criminal-justice system other than studying it?
10:55:50 3 A No.
10:55:50 4 Q Okay. You haven't had any -- any criminal
10:55:54 5 prosecutions of you or arrests or anything like that?
10:55:56 6 A No.
10:55:57 7 Q Okay. And -- let me quickly ask you, did -- I
10:56:07 8 think I asked this before. Did you do anything to
10:56:08 9 prepare for your testimony today, to get ready to come
10:56:12 10 here, in terms of looking at things or talking to your
10:56:14 11 lawyer?
10:56:15 12 A I looked at the complaint.
10:56:17 13 Q Okay.
10:56:18 14 A And I looked at some -- some of my responses
10:56:20 15 to questions.
10:56:24 16 Q What does that mean -- like, those
10:56:26 17 interrogatories?
10:56:27 18 A Yes.
10:56:27 19 Q Okay. Anything else?
10:56:28 20 A Not that I can think of.
10:56:30 21 Q Did you meet with Ronda?
10:56:34 22 A Yes.
10:56:35 23 Q Okay. And when was that? Yesterday?
10:56:36 24 A Yesterday.
10:56:38 25 Q How long did you guys spend together?

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10:56:39 1 A A few hours.

10:56:41 2 Q Three hours, roughly?

10:56:43 3 A I could not say.

10:56:45 4 Q Morning or afternoon?

10:56:47 5 A Afternoon.

10:56:48 6 Q And where was that?

10:56:50 7 A At a restaurant.

10:56:51 8 Q Okay. And did you guys have any documents

10:56:53 9 that you looked at in that meeting?

10:56:57 10 A No.

10:56:58 11 Q Okay. Other than Ronda, did you talk to

10:57:06 12 anybody else about your testimony today -- the fact that

10:57:08 13 you were going to take a deposition?

10:57:11 14 A Jeremy, my attorney.

10:57:13 15 Q Uh-huh. And did you meet with him to go over

10:57:17 16 whatever might come up today?

10:57:22 17 A Can you please be more specific?

10:57:23 18 Q Sure. How long has Jeremy been your attorney?

10:57:29 19 A Since May, I believe.

10:57:31 20 Q Okay. And have you spoken to him about the

10:57:34 21 fact that you are going to have your deposition taken?

10:57:36 22 A Yes.

10:57:37 23 Q Okay. And did you guys make time to prepare

10:57:42 24 together for the deposition?

10:57:44 25 A No.

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10:57:45 1 Q Okay. He left that to Ronda, I assume; right?

10:57:50 2 A I want to make sure I'm clear. I was with

10:57:51 3 Ronda here, physically.

10:57:53 4 Q Yes.

10:57:53 5 A So I didn't speak to him then. Separately --

10:57:55 6 he's spoken to me about what a deposition is.

10:58:00 7 Q Okay. And that was --

10:58:01 8 A Prior to today, yes.

10:58:02 9 Q Okay. And when you were talking to Jeremy

10:58:04 10 about what a deposition is or what might come up, were

10:58:07 11 you guys looking at documents together?

10:58:09 12 MR. MCLYMONT: I'm going to object to this

10:58:16 13 kind of question.

10:58:17 14 MR. O'SULLIVAN: It was a yes-or-no question.

10:58:18 15 MR. MCLYMONT: All right. Well, can I answer?

10:58:18 16 Can I -- [Unintelligible] -- that doesn't get --

10:58:24 17 THE COURT REPORTER: I cannot hear what you

10:58:24 18 are saying.

10:58:24 19 MS. DIXON: Oh, boy.

10:58:27 20 MR. O'SULLIVAN: Okay. I'll just tell you

10:58:28 21 the -- the connection's a little jumbled. I think what

10:58:30 22 you were saying is that I don't want her to talk about

10:58:33 23 privileged information. And that is -- I'm trying to

10:58:37 24 ask it so I don't get to that yet. I just want to know

10:58:40 25 whether there were communications.

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10:58:42 1 Is -- is -- by the way, is that Jeremy
10:58:43 2 speaking?

10:58:45 3 MR. MCLYMONT: Yes, it is.

10:58:48 4 MR. O'SULLIVAN: Okay.

10:58:49 5 BY MR. O'SULLIVAN:

10:58:49 6 Q So I'll ask it as a yes-or-no question.

10:58:51 7 Did you when you -- well, when you spoke with
10:58:53 8 Jeremy about the deposition, was it in person or some
10:58:55 9 other way?

10:58:56 10 A Via computer.

10:58:57 11 Q Like, a Zoom or a -- just a --

10:59:00 12 A Zoom, I believe.

10:59:01 13 Q Okay. And during that -- was there one
10:59:08 14 session or more than one?

10:59:12 15 A I -- I believe we had more than one session.

10:59:15 16 Q Okay. And taking them all together, did you
10:59:19 17 guys, during any part of that, look at documents from
10:59:22 18 the underlying events?

10:59:23 19 A No.

10:59:24 20 Q Didn't look at any emails or texts or web
10:59:27 21 pages or anything like that?

10:59:28 22 A No. No.

10:59:29 23 Q Okay. Other than your lawyers, have you
10:59:42 24 talked to anybody else about -- well, the fact that you
10:59:48 25 are being deposed in this case?

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10:59:52 1 A Yes.

10:59:53 2 Q Okay. Just give me a list.

10:59:55 3 Have you talked to Sonstar Peterson about your

11:00:00 4 depo in this case?

11:00:01 5 A No.

11:00:02 6 Q Okay. Who have you spoken to?

11:00:05 7 A I have spoken to Ceasar McDowell.

11:00:10 8 Q Okay. Who else?

11:00:12 9 A And that's all who I can recall at this time

11:00:15 10 is Ceasar.

11:00:16 11 MS. DIXON: Objection. Though. Regarding

11:00:18 12 this deposition? Just for clarification --

11:00:21 13 THE WITNESS: Oh.

11:00:21 14 MS. DIXON: -- the question he asked was this

11:00:23 15 deposition.

11:00:23 16 THE WITNESS: Well, the date has been changed.

11:00:24 17 Okay. Well, I'm sorry.

11:00:26 18 BY MR. O'SULLIVAN:

11:00:26 19 Q The question was just the fact that you are

11:00:27 20 going to be giving a deposition in this case. I was

11:00:30 21 trying to figure out who you said, "Hey, this is going

11:00:31 22 to happen." Who is in that circle?

11:00:33 23 A Right.

11:00:34 24 Q Is Ceasar in that circle?

11:00:35 25 A Is it specific to this deposition?

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11:00:38 1 Q My question was specific to -- to not this
11:00:40 2 moment in time. The fact that you are being deposed
11:00:42 3 regardless of when it was going to happen?

11:00:44 4 A Yes.

11:00:44 5 Q Okay. Anybody else you've talked to about
11:00:47 6 your deposition in this case besides Ceasar?

11:00:49 7 A I don't recall.

11:00:50 8 Q Your husband?

11:00:52 9 A No. We don't --

11:00:56 10 Q Does he know why you had to leave Houston?

11:00:58 11 A Right, yes. So let me say, yes. In that way,
11:01:01 12 yes.

11:01:06 13 Q Okay. Let me broaden it to this case in
11:01:12 14 general. Okay? The case -- Megan Pete against you.

11:01:15 15 Who were the people in -- sort of your life,
11:01:19 16 not your fans, people who you directly deal with who you
11:01:22 17 have spoken to about this case?

11:01:24 18 A Ceasar and Unite The People.

11:01:27 19 Q And Ceasar is from Unite The People?

11:01:29 20 A Yes. Per my knowledge, he is over it.

11:01:34 21 (The Court Reporter requested clarification.)

11:01:34 22 THE WITNESS: Over it. I'm sorry.

11:01:34 23 BY MR. O'SULLIVAN:

11:01:36 24 Q Over it?

11:01:37 25 A Like, the head of.

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11:01:38 1 Q Oh, okay. Okay.

11:01:39 2 A I'm sorry.

11:01:39 3 Q It seemed like he has gotten over it?

11:01:42 4 A No.

11:01:42 5 Q I'm not going to Unite The People anymore.

11:01:44 6 A I'm sorry.

11:01:45 7 Q All right. And how did you first meet

11:01:47 8 Mr. McDowell? Ceasar?

11:01:52 9 A I met Ceasar at trial. At the trial of

11:01:56 10 Daystar Peterson.

11:01:58 11 Q Okay. And Daystar Peterson also goes by

11:02:03 12 Tory Lanez; right?

11:02:04 13 A Yes.

11:02:05 14 Q For ease of reference, I'm going to refer to

11:02:08 15 him that way here.

11:02:09 16 Okay. And what were the circumstances? So it

11:02:12 17 was in connection with the trial. Were you introduced

11:02:14 18 to Ceasar by somebody?

11:02:15 19 A No. It was an in-passing "Hi."

11:02:18 20 Q And when you met him, did you have an

11:02:21 21 understanding of what his role was there? Why was he

11:02:23 22 there?

11:02:24 23 A No.

11:02:24 24 Q What did he tell you he was doing there?

11:02:26 25 A We didn't discuss that.

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11:02:29 1 Q Okay. Tell me what you remember about the
11:02:31 2 first conversation you had with Ceasar?

11:02:33 3 A It was a simple "Hi, my name is Milagro."
11:02:36 4 "Hi, I'm Ceasar." It was just an
11:02:38 5 introduction.

11:02:39 6 Q Okay. And when was the next time you talked
11:02:41 7 to him?

11:02:42 8 A I talked to him in passing in the hall during
11:02:44 9 trial.

11:02:44 10 Q All right. You saw each other around at the
11:02:46 11 trial.

11:02:47 12 When was the first time that you had, like, a
11:02:48 13 real conversation?

11:02:49 14 A A significant conversation with him?

11:02:51 15 Q Yeah.

11:02:51 16 A In 2023.

11:02:55 17 Q And tell me everything you can remember about
11:02:58 18 that conversation.

11:03:00 19 A We spoke briefly about him coming on an
11:03:03 20 Instagram Live to explain some case updates.

11:03:08 21 Q And -- and Instagram Live -- tell me how does
11:03:11 22 that work? That's like a -- what is it?

11:03:15 23 A It is -- Instagram Live is something -- you go
11:03:18 24 on Instagram, and you can stream essentially, pretty
11:03:21 25 much. You set your camera up, and another person can

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11:03:26 1 call in, and you can accept the invite and it would put
11:03:28 2 two people on your screen.

11:03:30 3 Q Okay. So it would almost look like -- like a
11:03:33 4 talk show or something. It's two people going back and
11:03:34 5 forth?

11:03:35 6 A Somewhat, yeah.

11:03:36 7 Q And is that something you do for the benefit
11:03:39 8 of other people watching, or it's just -- it's just like
11:03:41 9 a phone call?

11:03:42 10 A It's for the public.

11:03:43 11 Q Okay. And so you -- in 2023, after you saw
11:03:46 12 each other at the trial, you had a conversation about --
11:03:49 13 he wanted you to come on his, or he would come on yours?

11:03:52 14 A No. He would come on my platform.

11:03:54 15 Q Okay. And did you actually do that with him?

11:03:56 16 A Yes.

11:03:57 17 Q All right. And that was at -- after the
11:03:59 18 trial? During?

11:04:00 19 A After the trial.

11:04:00 20 Q After.

11:04:01 21 Was it after the verdict?

11:04:03 22 A Yes.

11:04:04 23 Q All right. So -- so you already knew there
11:04:06 24 was a conviction, and he came on to talk about it?

11:04:08 25 A Yes.

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11:04:09 1 Q Okay. And other than the fact that Ceasar was
11:04:20 2 attached to Unite The People, did you have an
11:04:22 3 understanding of what his interest in the case was?
11:04:25 4 What his background was?

11:04:26 5 A No.

11:04:27 6 Q What was he there -- well, you had -- you had
11:04:30 7 the live feed on Instagram, right, with him?

11:04:33 8 A Yes.

11:04:34 9 Q How long did that last?

11:04:35 10 A I wouldn't say more than an hour.

11:04:37 11 Q And what did you talk about?

11:04:43 12 A I don't recall past telling you that it was a
11:04:46 13 case update. I don't know what that case update was at
11:04:48 14 the time.

11:04:49 15 Q Did you do more than one of those with him?

11:04:51 16 A Yes.

11:04:52 17 Q How many altogether if you had to add them up?

11:04:55 18 A No more than 10.

11:04:57 19 Q Okay. And were the other -- was the one after
11:05:00 20 the verdict the very first one?

11:05:02 21 A I believe so.

11:05:07 22 Q And then when is the most recent one? When is
11:05:10 23 the last time you did one with him -- Ceasar?

11:05:12 24 A Over six months ago. It's been a while.

11:05:22 25 Q And why did you stop doing them?

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11:05:27 1 A I wouldn't say -- there was never a
11:05:28 2 conversation about stopping or da, da, da. It just
11:05:33 3 hasn't happened, I would say.

11:05:35 4 Q In your mind, why do you stop doing them?
11:05:38 5 Like, was there no more material?

11:05:39 6 A In my mind, it wasn't something that it
11:05:40 7 progressed in a way that I needed to be reporting on
11:05:44 8 certain things.

11:05:45 9 Q You didn't think it was going to produce more
11:05:50 10 helpful content for your presence?

11:05:51 11 A No. I didn't feel as though there had been a
11:05:54 12 significant update for me to report on.

11:05:56 13 Q Oh, okay. You are saying there wasn't really
11:05:58 14 any update --

11:05:59 15 A Right. Anything to talk about.

11:06:00 16 Q -- in the case?

11:06:01 17 A Right, right, right.

11:06:02 18 Q And that was the only thing you had to talk
11:06:04 19 about with Ceasar was the case update? He wasn't a
11:06:06 20 guest on any other subjects?

11:06:07 21 A No. He -- he was -- he simply talked about
11:06:10 22 the appeals process and what was going on currently.

11:06:12 23 Q And is he -- is he -- Ceasar a lawyer?

11:06:16 24 A Not to my knowledge.

11:06:19 25 Q And after all those case updates, did you come

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11:06:21 1 to have an understanding of what -- of what he brought
11:06:23 2 to the table? Why -- why was he commenting on this
11:06:26 3 case?

11:06:29 4 A I couldn't speak to all the reasons why.

11:06:31 5 MS. DIXON: I'm going to object because it
11:06:32 6 calls for speculation. But --

11:06:34 7 BY MR. O'SULLIVAN:

11:06:34 8 Q Well, I only want what you know.

11:06:36 9 So did anybody tell you, including Ceasar, why
11:06:39 10 he had a personal interest in the case?

11:06:41 11 A Uh-huh. No.

11:06:43 12 Q And sitting here today, you have no idea why
11:06:46 13 he was interested in this case, as opposed to any other
11:06:48 14 one?

11:06:48 15 A No.

11:06:49 16 Q Did he have some connection to Tory Lanez?

11:06:54 17 A Not that I know of.

11:06:58 18 Q And when is the most recent time you were in
11:07:01 19 touch with Ceasar? Six months ago?

11:07:03 20 A No. It was more recent than that. I would
11:07:10 21 say April, May-ish.

11:07:14 22 Q Okay. And -- and you weren't -- was that
11:07:16 23 about doing another case update, or something else about
11:07:18 24 the case?

11:07:20 25 A All of my interactions with him at that point

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11:07:22 1 were about my case. Strictly.

11:07:25 2 Q All right. And -- and what was his role --
11:07:28 3 what is his role in your case?

11:07:30 4 A He is no longer a person affiliated with my
11:07:33 5 case.

11:07:34 6 Q I didn't hear the end. He's no longer a
11:07:35 7 person of what?

11:07:36 8 A Affiliated with my case.

11:07:38 9 Q Okay. Before he was no longer affiliated,
11:07:41 10 meaning when he was affiliated, what was his role? How
11:07:43 11 was he helping you or working with you?

11:07:45 12 A Ceasar propositioned me to represent me
11:07:50 13 pro bono -- for Unite The People to represent me
11:07:53 14 pro bono.

11:07:53 15 So my understanding was that Unite The People
11:07:57 16 was representing me, and he would handle anything that
11:07:59 17 had to do with lawyers, enlisting lawyers. Anything
11:08:05 18 about my case, he was my point of contact. I was to
11:08:07 19 speak to him and pay him.

11:08:10 20 Q "And pay him," you said?

11:08:12 21 A Eventually, it turned into that, yes.

11:08:15 22 Q And when did that idea first get discussed
11:08:19 23 between you and Ceasar? So you are doing the case
11:08:21 24 updates; it's about Tory's case. And then at some
11:08:24 25 point, you are in this case with Megan.

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11:08:27 1 And that conversation where he propositioned
11:08:30 2 you about being pro bono, put that in the calendar.

11:08:32 3 Was it 2024? 2025?

11:08:37 4 A I was served in October of 2024, and within
11:08:40 5 days he had reached out to me to ask to represent me.

11:08:45 6 Q Okay. And you told me you don't know whether
11:08:48 7 he is a lawyer; right?

11:08:49 8 A Right.

11:08:50 9 Q And did you have an understanding, when he was
11:08:51 10 reaching out to you, one way or another whether he was
11:08:54 11 the lawyer he was going to provide to you?

11:08:58 12 A I -- I honestly didn't have a real
11:09:00 13 understanding of all the inner workings, to be honest.

11:09:04 14 Q I mean, did he say he was going to go to court
11:09:07 15 for you or appear in your case? Or did he say, "I'll
11:09:10 16 find someone" or something else?

11:09:11 17 A Ceasar just told me that Unite The People
11:09:15 18 wanted to represent me pro bono and that things would be
11:09:18 19 handled.

11:09:20 20 Q Okay. And -- and did you agree to that?

11:09:23 21 A Yes.

11:09:24 22 Q And did you have an understanding of what your
11:09:28 23 side of the bargain was? Like --

11:09:31 24 A Yes.

11:09:31 25 Q And tell me what that was?

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11:09:33 1 A To be cooperative.

11:09:35 2 Q With who?

11:09:37 3 A With the lawsuit in general. My role was
11:09:40 4 to -- when I was asked to produce something, or we
11:09:44 5 needed a meeting, I was to be present and to do my part.

11:09:49 6 Q Okay. So just cooperating in your own
11:09:51 7 defense?

11:09:51 8 A Right, right.

11:09:53 9 Q Which you would have done anyway; right?

11:09:54 10 A Of course.

11:09:55 11 Q And then you said something about paying him
11:09:58 12 back eventually.

11:09:59 13 What was that? Was that talked about in the
11:10:01 14 beginning?

11:10:02 15 A No.

11:10:03 16 Q When did that come up?

11:10:04 17 A When Ceasar stole my money.

11:10:07 18 Q Tell me about that.

11:10:09 19 A The contract was for a pro bono
11:10:11 20 representation. Ceasar came to me and said, "I need
11:10:17 21 money for your lawyer, and if you don't figure something
11:10:21 22 out, you are not going to have a lawyer because I can't
11:10:24 23 do it."

11:10:27 24 Q All right. So you said your contract called
11:10:29 25 for pro bono.

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11:10:29 1 Was that written --

11:10:30 2 A Yes.

11:10:31 3 Q -- contract?

11:10:31 4 A Yes.

11:10:32 5 Q You still have that?

11:10:34 6 A I'm -- I may. I have to look.

11:10:37 7 Q I -- we'd ask you to produce that.

11:10:39 8 MS. DIXON: Okay. Well, I might object to
11:10:40 9 that because it might be privileged. That's her
11:10:42 10 attorney.

11:10:43 11 MR. O'SULLIVAN: It's a contract. It's an
11:10:45 12 operative document.

11:10:46 13 MS. DIXON: I understand, but it's just like
11:10:47 14 a -- you know, my --

11:10:50 15 MR. O'SULLIVAN: Take it under advisement.
11:10:52 16 I'd ask you to produce that if you decide it's not
11:10:54 17 privileged.

11:10:55 18 MS. DIXON: Okay.

11:10:56 19 BY MR. O'SULLIVAN:

11:10:56 20 Q Is that contract for anything other than to
11:10:59 21 be -- to represent you?

11:11:02 22 A No.

11:11:02 23 Q And you signed that contract. Yeah?

11:11:06 24 A Yes.

11:11:06 25 Q And who signed it for the other party?

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11:11:09 1 A I believe Ceasar signed it.

11:11:10 2 Q All right. And that's a contract between
11:11:14 3 Milagro and Unite The People?

11:11:15 4 A To my knowledge, yes.

11:11:17 5 Q When is the last time you looked at it?

11:11:19 6 A When it was presented to me in November of
11:11:23 7 2024.

11:11:24 8 Q Okay. And did you talk to a lawyer about
11:11:28 9 signing that?

11:11:30 10 A No.

11:11:30 11 Q Did you talk to anybody about whether you
11:11:32 12 should sign that besides Ceasar?

11:11:37 13 A I believe I spoke publicly on my show.

11:11:43 14 Q About the fact that you had been -- this
11:11:45 15 proposal had been made, and you were going to go with
11:11:48 16 it?

11:11:49 17 A Yes.

11:11:49 18 Q Did you do any investigation of who these
11:11:51 19 people were? Unite The People?

11:11:56 20 A No.

11:11:56 21 Q I mean, you were entrusting your legal defense
11:11:59 22 to them. Yeah?

11:12:00 23 A Right.

11:12:00 24 Q It's a big step.

11:12:01 25 You didn't make any investigation as to why

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11:12:05 1 they were involved? What their motives were?

11:12:07 2 A No.

11:12:08 3 Q Did they tell you what their motives were?

11:12:10 4 A Ceasar said that he of created Unite The
11:12:14 5 People to help people like me that he believed were
11:12:16 6 being bullied and taken advantage of.

11:12:19 7 Q And did he give you examples of people, other
11:12:22 8 than you, he had helped? Like, were they doing this for
11:12:27 9 the first time with you, or this is something they've
11:12:29 10 been doing for years?

11:12:30 11 A It was my understanding that the foundation
11:12:32 12 was built on helping people in that way.

11:12:36 13 Q But did you -- were you aware of any examples
11:12:39 14 where they had done that in another case before?

11:12:44 15 A Not in my -- not in a case like mine but yes.

11:12:47 16 Q And what -- in other words, something made you
11:12:50 17 think this is a good idea.

11:12:52 18 Did they tell you, "We've been successful for
11:12:54 19 some other people in this kind of circumstance"?

11:12:56 20 A No.

11:12:58 21 Q Did you think they had any expertise in
11:13:02 22 dealing with this situation?

11:13:06 23 A I did once I spoke with them.

11:13:09 24 Q And what did they tell you that made you think
11:13:11 25 they had expertise at this?

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11:13:13 1 A Once I spoke to the lawyers, and they
11:13:16 2 explained the lawsuit, and --

11:13:18 3 Q I don't want you to tell me your conversation
11:13:20 4 with the lawyer; so I'm going to be careful, 'cause your
11:13:22 5 lawyer asked me that and that's fair.

11:13:24 6 A Okay.

11:13:24 7 Q So I'm going to ask you some questions about
11:13:27 8 the conversations. If you are having a lawyer-client
11:13:30 9 conversation and there's not other people, including
11:13:32 10 maybe Ceasar, then that would be privileged -- or could
11:13:35 11 be privileged.

11:13:35 12 So it sounds like they put you in touch with
11:13:41 13 an actual lawyer, right, at some point?

11:13:43 14 A Yes.

11:13:43 15 Q Who was that?

11:13:45 16 A Walter.

11:13:46 17 Q Okay.

11:13:47 18 A I don't know his last name at the time and a
11:13:50 19 man named Michael Hayden.

11:13:52 20 Q The last name?

11:13:53 21 A Hayden, H-A-Y-D-E-N.

11:13:56 22 Q Okay. And did Walter and Michael eventually
11:14:05 23 become your lawyers.

11:14:06 24 A Michael Hayden did.

11:14:09 25 Q Okay. And without telling me what was

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11:14:11 1 discussed, you were put in touch with Michael Hayden,
11:14:12 2 and at the end of that you said, "Yes, I'm going to work
11:14:19 3 with these people"?

11:14:19 4 A Yes.

11:14:20 5 Q In the time you did that, you understood,
11:14:21 6 based on your contract, that it was going to be
11:14:22 7 pro bono; right?

11:14:24 8 A Yes.

11:14:25 9 Q And at some later time, you told me Ceasar
11:14:27 10 stole your money?

11:14:28 11 A Yes.

11:14:29 12 Q So walk me from when you started with Michael
11:14:31 13 to that.

11:14:32 14 A It was supposed pro bono. Ceasar told me
11:14:40 15 because of Unite The People's role, that I needed to pay
11:14:43 16 him directly. I started a campaign on GiveSendGo, I
11:14:52 17 withdrew the money, and I sent it to Ceasar via Zelle in
11:14:57 18 increments. I had sent maybe about 9,000.

11:15:03 19 Michael Pancier, who was my Florida attorney,
11:15:07 20 he reached out to me --

11:15:12 21 MS. DIXON: Anything that's privileged --

11:15:13 22 BY MR. O'SULLIVAN:

11:15:13 23 Q Yeah. Your lawyer is concerned. So I think
11:15:15 24 we can get what we need here without getting into what
11:15:18 25 they said to you; so let me just do transactional.

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11:15:21 1 A Okay.

11:15:22 2 Q So, at some point Ceasar, who is not a lawyer,
11:15:24 3 reaches out and says, "Whatever it was before now, you
11:15:26 4 have to pay"; right? "I need money for lawyers."

11:15:28 5 Did you have a conversation about the fact
11:15:32 6 that that wasn't the deal?

11:15:34 7 A Absolutely.

11:15:35 8 Q And tell me about that conversation.

11:15:36 9 In person or on the phone?

11:15:37 10 A On the phone.

11:15:38 11 Q And what did you say, and what did he say?

11:15:40 12 A I told him that I felt really abandoned, and I
11:15:44 13 was upset because it was supposed to be pro bono. I
11:15:47 14 told him I would try as much as I could, but that was --
11:15:53 15 that was pretty much it.

11:15:54 16 He basically told me, "It takes money. You
11:15:57 17 need to find some money."

11:15:59 18 Q Okay. And did you have an understanding as to
11:16:04 19 whether Unite The People had other sources of money to
11:16:08 20 help you?

11:16:09 21 A No. I had no idea about that.

11:16:13 22 Q When they first proposed representing you
11:16:16 23 pro bono, did you have an understanding of how they were
11:16:18 24 going to pay the lawyers?

11:16:19 25 A Uh-huh. Not at all.

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11:16:21 1 Q Did you have an understanding of who funded
11:16:23 2 them, generally?

11:16:24 3 A No.

11:16:25 4 Q Did you know anybody who was a donor to Unite
11:16:27 5 The People?

11:16:28 6 A No.

11:16:28 7 Q Other than this money through Zelle for the
11:16:34 8 lawyers, did you ever make donations to Unite The
11:16:36 9 People?

11:16:37 10 A No.

11:16:42 11 Q Do you know who the principal members are of
11:16:43 12 Unite The People?

11:16:44 13 A No.

11:16:45 14 Q Do you know any members of Unite The People?

11:16:47 15 A Ceasar McDowell, Michael Hayden, Walter,
11:16:52 16 and --

11:16:54 17 Q Michael Hayden and Walter, the lawyers, are
11:16:58 18 members of Unite The People?

11:16:59 19 A I believe so.

11:17:01 20 Q Okay. Anybody else who was attached to Unite
11:17:05 21 The People besides Ceasar and Michael and Walter?

11:17:09 22 A There -- they have other people in their
11:17:11 23 office that I've spoken to, but I don't know -- I don't
11:17:14 24 know their names or exactly who they are.

11:17:17 25 Q And where is their office?

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11:17:19 1 A I've never been to it, but I believe it's in
11:17:21 2 California.

11:17:23 3 Q All right. And tell me everything you can
11:17:26 4 about what Unite The People was doing before they
11:17:30 5 offered to be your lawyer. Like, what did you know?
11:17:33 6 That's a big step. What did you know about them in the
11:17:35 7 real world?

11:17:36 8 A My only point of reference with Unite The
11:17:38 9 People was the association with the Tory Lanez case.

11:17:43 10 Q All right. And what did you understand with
11:17:44 11 that association?

11:17:45 12 A That Unite The People was, in some form or
11:17:48 13 fashion, working on an appeal.

11:18:03 14 MR. O'SULLIVAN: Are we good?

11:18:04 15 MS. DIXON: It's getting feedback.

11:18:05 16 MR. O'SULLIVAN: Yeah. There was echo. Is
11:18:05 17 it --

11:18:07 18 MS. HAYRAPETIAN: Is there an echo? Is it
11:18:08 19 gone?

11:18:09 20 MR. O'SULLIVAN: I think it's gone.

11:18:10 21 BY MR. O'SULLIVAN:

11:18:11 22 Q Okay. And did you think Unite The People was
11:18:25 23 connected in any way with Tory Lanez' camp?

11:18:30 24 A Can you be more specific?

11:18:32 25 MS. DIXON: I was going to object as to being

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11:18:34 1 overbroad; so, yeah.

11:18:37 2 MR. O'SULLIVAN: Well, I'm starting broad, and
11:18:38 3 then I'll narrow it down.

11:18:40 4 BY MR. O'SULLIVAN:

11:18:40 5 Q Are you aware of any connection whatsoever
11:18:42 6 between Tory Lanez and his team and Unite The People?

11:18:44 7 A No.

11:18:45 8 Q Do you think they're unrelated? Because I
11:18:49 9 thought you told me the reason you knew about them and
11:18:51 10 their prior work was because they were involved with the
11:18:53 11 Tory Lanez' appeal?

11:18:54 12 A But you just asked me about a group. You said
11:18:58 13 Tory Lanez group.

11:18:59 14 Q I'm asking about two things. Does Unite The
11:19:01 15 People have anything to do with Tory Lanez?

11:19:04 16 A Yes. As -- per my understanding, they're
11:19:05 17 working on appeal for Tory Lanez.

11:19:07 18 Q All right. So tell me everything you know
11:19:09 19 about any connection between -- or work between Unite
11:19:12 20 The People and anyone attached to Tory Lanez.

11:19:15 21 A The only thing I'm aware of is the Tory Lanez
11:19:18 22 case and documents that were filed after the verdict.

11:19:24 23 Q What documents were filed after the verdict?

11:19:26 24 A I do not know the names of these documents,
11:19:28 25 but the things that were filed to help with the appeal.

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11:19:32 1 Whatever those different documents are that were
11:19:34 2 submitted to the court.
11:19:36 3 Q Okay. And do you know who those lawyers were?
11:19:38 4 A No.
11:19:39 5 Q They weren't -- they weren't the same lawyers
11:19:40 6 as the ones that were helping you?
11:19:42 7 A I don't know.
11:19:43 8 Q Okay. So you understood that Unite The People
11:19:48 9 was involved in the appeal?
11:19:51 10 A Yes.
11:19:52 11 Q Tory Lanez appealed his conviction?
11:19:54 12 A Yes.
11:19:54 13 Q Maybe the motion for retrial?
11:19:56 14 A All I know is about the appeal, for sure.
11:19:58 15 Q Okay. Have you ever discussed Unite The
11:20:11 16 People or their work with Tory Lanez' dad?
11:20:16 17 A Yes.
11:20:18 18 Q How many times? How many times has that come
11:20:21 19 up in your conversations?
11:20:22 20 A Only a few, I would say.
11:20:25 21 Q Okay. And when is the first time you
11:20:30 22 communicated in any way with Tory Lanez' dad?
11:20:34 23 A In 2020.
11:20:35 24 Q Okay. I'm going to call him "Sonstar."
11:20:37 25 Is that okay? That's his name; right?

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11:20:40	1	A	Yes.
11:20:41	2	Q	Is that what you called him?
11:20:42	3	A	Yeah, Sonstar.
11:20:43	4	Q	Okay. 'Cause there's two Mr. Petersons.
11:20:47	5		What were the circumstances when you first
11:20:50	6		communicated with Sonstar?
11:20:54	7	A	Sonstar sent me a message on Instagram.
11:21:00	8	Q	You said that was in 2020?
11:21:01	9	A	I believe so.
11:21:03	10	Q	And what did the message say?
11:21:05	11	A	I don't recall.
11:21:06	12	Q	Generally, what -- it got your attention.
11:21:08	13		What did you do after you got that message?
11:21:14	14	A	I responded in some form or fashion. I don't
11:21:16	15		recall what I said.
11:21:17	16	Q	What was the subject matter?
11:21:19	17	A	My show.
11:21:22	18	Q	And in terms of the Tory Lanez case and the
11:21:25	19		shooting and all that, when was this -- was this after?
11:21:28	20	A	This was after.
11:21:29	21	Q	Okay. And Tory Lanez -- had he already been
11:21:33	22		arrested?
11:21:36	23	A	Could you be specific because I believe there
11:21:39	24		was --
11:21:40	25	Q	I'm just trying to know what was going on when

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11:21:42 1 this guy reached out to you, like, in relation to what
11:21:46 2 we know was the incident, the case?

11:21:47 3 A At the time he reached out to me, I do not
11:21:49 4 believe there had been an arrest yet or anything like
11:21:54 5 that.

11:21:54 6 Q Okay. And when he reached out to you -- well,
11:22:00 7 what's the first substance you can remember talking
11:22:03 8 about with Sonstar? You told me you can't remember his
11:22:09 9 first IG message.

11:22:10 10 You can't remember your response?

11:22:14 11 A No, not verbatim. He was just a fan of my
11:22:17 12 show. He liked my show.

11:22:19 13 Q Okay. So he reached out like a lot of people
11:22:21 14 do, and said, "I love what you are doing"?

11:22:22 15 A Uh-huh. Maybe something to that effect, but I
11:22:25 16 don't recall.

11:22:25 17 Q Maybe something what?

11:22:26 18 A Maybe something to that effect, but I couldn't
11:22:28 19 recall.

11:22:29 20 Q Was he trying to connect with you to do -- to
11:22:31 21 have further conversations?

11:22:34 22 A I don't recall. I believe it was a simple "I
11:22:36 23 like your show" maybe.

11:22:37 24 Q Okay. If you were to -- to start there and
11:22:40 25 fast-forward all the way to today. How many

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11:22:43 1 conversations have you had with Sonstar?

11:22:48 2 A I could not give you an approximate number.

11:22:50 3 Q Less than 5?

11:22:52 4 A More than 5.

11:22:53 5 Q More than 10?

11:22:55 6 A That would just be very difficult. I have

11:22:57 7 literally no idea how often or how many times I've

11:22:59 8 spoken to him.

11:23:00 9 Q I mean, we've looked at the files. It's --

11:23:01 10 it's probably hundreds; right?

11:23:04 11 A I don't know.

11:23:05 12 Q Are you in a position right now to say it

11:23:07 13 wasn't that many?

11:23:08 14 A I don't know.

11:23:10 15 Q You can't distinguish between whether it was 5

11:23:13 16 or 10 and 100?

11:23:14 17 A No. Because then I would be giving you a

11:23:16 18 number.

11:23:16 19 Q Well, I don't want you to be precise, but I

11:23:19 20 want you to say what you would say if you were pressed

11:23:22 21 on it, which is I want you to do the best you can.

11:23:24 22 Is it more than 10,000?

11:23:26 23 A Uh-huh. I don't know.

11:23:28 24 Q You do know. You do you were on them; right?

11:23:29 25 A More than 100.

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11:23:32 1 Q Okay. More than 100 over what period of time?

11:23:36 2 Three, four years? Five years?

11:23:37 3 A Five years.

11:23:38 4 Q Okay. And how would the two of you

11:23:42 5 communicate? Phone call?

11:23:44 6 A Yes.

11:23:45 7 Q Did you guys do other things? Zooms or any of

11:23:48 8 these other formats?

11:23:50 9 A No.

11:23:51 10 Q Okay. And how would you describe the reason

11:23:58 11 you had all these conversations? Why were you talking

11:24:03 12 so much?

11:24:04 13 A Because of the role that he ultimately

11:24:07 14 occupied, I feel, in my life as a father figure and

11:24:11 15 mentor.

11:24:12 16 Q Okay. So you said, "father figure and

11:24:17 17 mentor"?

11:24:18 18 A Uh-huh.

11:24:19 19 Q And when -- when did you first start thinking

11:24:24 20 of Sonstar as a father figure or a mentor? Like, when

11:24:27 21 did it get to the point where you thought of him that

11:24:29 22 way?

11:24:35 23 A Sonstar came to Houston for a visit. It was

11:24:39 24 after that.

11:24:41 25 Q Is that still probably during 2020?

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11:24:43 1 A No. Maybe 2021 -- maybe.

11:24:47 2 Q How does it compare to where the case was --
11:24:49 3 the Tory Lanez case.

11:24:51 4 Was he awaiting trial?

11:24:53 5 A No. This was like in 2021 maybe; so no.

11:24:59 6 Q Okay. All right. So Sonstar comes to
11:25:11 7 Houston. And tell me about whatever interaction you had
11:25:13 8 with him on that trip.

11:25:15 9 A I believe I did -- I did a show, and then me,
11:25:21 10 my husband and my children spent the day essentially
11:25:25 11 with him.

11:25:26 12 Q So he appeared on your show?

11:25:29 13 A Not on that occasion, no.

11:25:30 14 Q Okay. You did a show. Tell me what that was.

11:25:33 15 A Routine. I literally just did a regular show
11:25:36 16 that day, and when I got done, we went and had a day
11:25:39 17 out.

11:25:40 18 Q Oh. But -- but Sonstar wasn't on the show?

11:25:42 19 A No. It wasn't about him at all. I just
11:25:44 20 literarily -- it was a word day.

11:25:45 21 Q It just happened to be what you were doing
11:25:46 22 that morning.

11:25:47 23 A Yeah.

11:25:47 24 Q And then you did something later in the day
11:25:49 25 with your family and him.

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11:25:50 1 A Uh-huh.

11:25:51 2 Q And what did you guys do?

11:25:52 3 A We chitchatted and went to dinner.

11:25:56 4 Q Okay. And you think this was probably in

11:26:01 5 2021. What -- what -- what was it in your interactions

11:26:05 6 with him -- well, starting with that, when was it that

11:26:08 7 you started thinking of him like a mentor or father

11:26:10 8 figure?

11:26:11 9 Was it something in that first dinner? Or by

11:26:13 10 then, you were already getting there?

11:26:16 11 A Per our phone conversations. And I think that

11:26:18 12 it was more solidified once we got to spend some time

11:26:21 13 with each other with the family.

11:26:23 14 Q Uh-uh.

11:26:24 15 A My family.

11:26:25 16 Q And other than the Tory Lanez case, what were

11:26:32 17 the areas that -- that you guys spent time talking

11:26:34 18 about?

11:26:34 19 A We talked about faith. We talked about

11:26:37 20 different things I may be going through. Very

11:26:41 21 faith-based, I would say.

11:26:43 22 Q Very what?

11:26:43 23 A Faith-based, I would say.

11:26:45 24 Q Okay. And he -- is he a minister of some

11:26:52 25 kind?

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11:26:52 1 A I believe so.

11:26:55 2 Q I mean, do you share the same -- are you the

11:26:58 3 same religion as him?

11:26:59 4 A Yes.

11:27:00 5 Q Okay. And what is that religion?

11:27:02 6 A Christian Baptist. We believe in God.

11:27:04 7 Q And so you guys bonded over that, I guess.

11:27:09 8 Yeah?

11:27:10 9 A Yes.

11:27:10 10 Q Okay. And -- all right.

11:27:17 11 The -- the -- how much -- of the hundreds of

11:27:22 12 conversations over the years you have kind of mentoring

11:27:24 13 and that general, how much of what you talked about was

11:27:27 14 actually kind of related to the Tory Lanez situation?

11:27:33 15 Where he is? How he gets out of there? That kind of

11:27:36 16 stuff?

11:27:36 17 A It was more limited, actually.

11:27:38 18 Q That topic was more limited?

11:27:40 19 A Yes.

11:27:40 20 Q You talked about other things more than that?

11:27:42 21 A Absolutely.

11:27:43 22 Q Okay. What were those other things? Faith

11:27:48 23 you said; right?

11:27:49 24 A Right. I have two children; so --

11:27:51 25 Q Yes.

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11:27:52 1 A Sonstar has two younger children who are about
11:27:55 2 the ages of my two children; so that's another talking
11:27:58 3 point. That's it. Day-to-day things, honestly.

11:28:04 4 Q Did you talk with him at any time in this
11:28:09 5 stretch about -- about how you are going to finance your
11:28:13 6 legal defense?

11:28:14 7 A No.

11:28:20 8 Q Were you still in touch with Sonstar when --
11:28:22 9 when Ceasar was saying, "You are going to have to come
11:28:25 10 up with some money"?

11:28:26 11 A No. I stopped communicating with him.

11:28:29 12 Q When did you stop communicating with Sonstar?

11:28:32 13 A Once I was served with the lawsuit.

11:28:33 14 Q With the lawsuit in this case?

11:28:38 15 A Yes, with this lawsuit.

11:28:40 16 Q So, like, October of last year?

11:28:41 17 A Yes.

11:28:44 18 Q And whose decision was that to stop
11:28:48 19 communicating?

11:28:49 20 A Mine.

11:28:50 21 Q You -- did you reach out and say to him, "I'm
11:28:53 22 not going to communicate with you anymore"?

11:28:55 23 A No.

11:28:55 24 Q You just stopped?

11:28:56 25 A Yes.

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11:28:58 1 Q Did he reach out and say, "Hey, you are not
11:28:59 2 calling anymore. What's going on?"
11:29:00 3 A Yes.
11:29:01 4 Q And you said what?
11:29:02 5 A Nothing.
11:29:03 6 Q You just didn't respond?
11:29:06 7 A Right.
11:29:07 8 Q You've never communicated to him a reason why
11:29:10 9 you stopped being in touch?
11:29:12 10 A No.
11:29:13 11 Q Even though he was a father figure? A mentor?
11:29:16 12 Close? Religious bonding? You just cut it off?
11:29:20 13 A Yes.
11:29:21 14 Q And what would you say your reason for that
11:29:22 15 is?
11:29:23 16 A Because of the accusations against me, per the
11:29:26 17 lawsuit.
11:29:28 18 Q Explain that to me?
11:29:31 19 A I was being accused of, essentially, colluding
11:29:34 20 with him. I did not want to add to that; so I stopped
11:29:37 21 communication.
11:29:40 22 Q You thought if you continued to be in touch
11:29:41 23 with him, people would continue to say you are colluding
11:29:44 24 with him --
11:29:44 25 A Yes.

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11:29:44 1 Q -- to get these messages out?

11:29:46 2 A Yes.

11:29:48 3 Q All right. And have you had any contact with

11:29:52 4 him since then? With Sonstar?

11:29:56 5 A Yes.

11:29:57 6 Q All right. Tell me that.

11:29:58 7 How many times?

11:30:01 8 A Only -- maybe once or twice.

11:30:04 9 Q So you've -- you -- in your mind at least,

11:30:06 10 you -- you ceased the communications --

11:30:09 11 A Uh-huh.

11:30:09 12 Q -- when you got the lawsuit because you didn't

11:30:11 13 want people to say you were colluding.

11:30:13 14 A Right.

11:30:13 15 Q But you still had one or two interactions

11:30:15 16 after that?

11:30:17 17 A Right. More recently.

11:30:18 18 Q And what were the circumstances?

11:30:19 19 Well, first of all, how many were there? How

11:30:23 20 many times have you interacted with Sonstar post the

11:30:27 21 filing of this lawsuit?

11:30:29 22 A Probably less than three.

11:30:31 23 Q Okay. And when is the most recent one?

11:30:35 24 A I don't recall.

11:30:36 25 Q Best you can do?

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11:30:40 1 A Couple months ago.

11:30:41 2 Q I mean, there's only October to now; right?

11:30:43 3 So --

11:30:44 4 A Probably July.

11:30:45 5 Q Okay. Maybe in July? And tell me --

11:30:46 6 A Not in July. I said it is July now. You said

11:30:49 7 it was October.

11:30:50 8 Q I'm saying the period we're talking about is

11:30:52 9 between October and July; right?

11:30:53 10 A Right.

11:30:54 11 Q And you had three interactions somewhere in

11:30:56 12 there. That's your testimony; right?

11:30:58 13 A Right. It was in more recent months, though,

11:31:01 14 in 2025 that I've had a chat with him.

11:31:03 15 Q Okay. And can you separate out the two or

11:31:09 16 three calls in your head? Were they different subject

11:31:13 17 matters?

11:31:14 18 A No. They were all the same thing.

11:31:18 19 Q So you've made a decision you are not going to

11:31:19 20 be in touch with him.

11:31:20 21 Who initiates contact the first time post the

11:31:23 22 filing of this lawsuit?

11:31:28 23 A I couldn't say.

11:31:30 24 Q Somebody called somebody or reached out?

11:31:33 25 A Right. Me and Sonstar -- I got the lawsuit,

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11:31:38 1 and we spoke to Ceasar, like, on -- on a call.

11:31:42 2 Q Together?

11:31:43 3 A Uh-huh.

11:31:46 4 Q Okay. Well, all right. You just told me you
11:31:49 5 didn't want to be interacting with Sonstar because you
11:31:53 6 didn't want to feed these allegations of collusion;
11:31:54 7 right?

11:31:55 8 A Right.

11:31:56 9 Q So what made you move past that and say, "Oh,
11:31:58 10 I'll get on a call with him and Ceasar"?

11:32:01 11 A I was -- oh. I got on a call with him and
11:32:03 12 Ceasar because I was accused by the blogs of receiving a
11:32:06 13 certain amount of money from him. And Ceasar -- I
11:32:08 14 wanted to talk to Ceasar and the lawyers about it. And
11:32:12 15 I think they patched him in or something -- Sonstar.

11:32:17 16 Q Was Ceasar trying to get Sonstar to contribute
11:32:20 17 to your fees?

11:32:22 18 A No. I think that he wanted to understand the
11:32:26 19 alleged payments.

11:32:30 20 Q At this point had Ceasar already said, "If you
11:32:33 21 don't come up with some money, we're not going to be
11:32:35 22 your lawyers"?

11:32:36 23 A No.

11:32:37 24 Q So you were still a pro-bono client of Ceasar
11:32:40 25 and Unite The People. Yeah?

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11:32:43 1 A I would have to -- I don't know the exact
11:32:45 2 dates on that, but I believe -- I believe I was already
11:32:48 3 with Unite The People, and they were representing me
11:32:51 4 pro bono.

11:32:52 5 Q Okay.

11:32:52 6 A At that time.

11:32:53 7 Q And -- and did Ceasar ask to be able to talk
11:32:58 8 to Sonstar or vice versa?

11:33:01 9 A I don't recall.

11:33:02 10 Q All right. What was said? What did they talk
11:33:04 11 about once the three of you got together? It was
11:33:06 12 something about payments.

11:33:07 13 A Uh-huh.

11:33:08 14 Q Tell me what you can remember Ceasar saying
11:33:10 15 and Sonstar saying and you saying?

11:33:12 16 A Ceasar said that -- or I believe that I sent
11:33:16 17 some screenshots of some blogs running an exclusive that
11:33:20 18 I had received some money from Sonstar. And so when we
11:33:23 19 got on the call, I sent a text explaining what I -- what
11:33:28 20 they were about.

11:33:31 21 Q A text to Ceasar?

11:33:33 22 A Yeah. I sent a text to Sonstar.

11:33:36 23 Q Who -- who -- so -- so, I guess you -- you saw
11:33:44 24 people out there saying you were getting money from
11:33:47 25 Sonstar. Yeah?

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11:33:49 1 A Uh-huh.

11:33:50 2 Q And then Ceasar wanted to talk to you about
11:33:52 3 what was really going on; is that right?

11:33:54 4 A Right.

11:33:54 5 Q Okay. And then you wanted to put Ceasar with
11:33:56 6 Sonstar to get to the bottom of it?

11:33:58 7 A No. I believe Ceasar wanted to include
11:34:01 8 Sonstar to maybe get two perspectives, but I couldn't
11:34:03 9 speak for him.

11:34:04 10 Q Okay. And on that conversation, did you guys
11:34:07 11 talk about whatever money had changed hands between
11:34:10 12 Sonstar and you over time?

11:34:13 13 A Yes.

11:34:14 14 Q Okay. And do you remember the amounts that
11:34:18 15 you were talking about?

11:34:20 16 A I remember the overall amount.

11:34:22 17 Q And what was the overall amount?

11:34:24 18 A \$3,000.

11:34:24 19 Q Okay. And people in the blogs were saying
11:34:27 20 that that money flowed from Sonstar to you, and they
11:34:31 21 were saying that was to -- to advance the message of the
11:34:34 22 Tory Lanez' situation?

11:34:36 23 A Yes. Yes.

11:34:37 24 Q And -- and you say, "I think that -- no, it
11:34:42 25 was for something else"; right?

1 A Yes.

2 Q Okay. And it was -- what was it again?
3 Birthday gifts?

4 A You would have to outline, and then I could
5 speak to it better.

6 Q Okay. Other than birthday gifts for your
7 kids, can you think of any reason why Sonstar would be
8 giving you money?

9 A Yes. So I know all the reasons why he gave me
10 money. I don't know the exact amount.

11 Q Oh. Just tell me the reasons.

12 A Okay. There was an occasion where he sent me
13 birthday money. My birthday is [REDACTED].

14 Q Okay. And did he do that once or more than
15 once?

16 A He did that once.

17 Q And how does that tie into when -- how long
18 had you known him at that point?

19 A I couldn't say. Maybe -- I couldn't say. It
20 was years ago. Not long.

21 Q All right. And that was the first time he
22 ever sent you money?

23 A I believe so.

24 Q And was it Zelle or Venmo?

25 A It was Zelle.

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11:35:48 1 Q All right. And were you surprised?

11:35:52 2 A lot of other people send you cash that day?

11:36:03 3 A Yes.

11:36:03 4 Q Okay. So did you have -- well, I asked you

11:36:06 5 the question, were you surprised that -- that Sonstar

11:36:08 6 sent you money on your birthday?

11:36:14 7 A I don't know if that's the adjective --

11:36:17 8 "surprised."

11:36:18 9 Q Were you expecting it when it came?

11:36:20 10 A No.

11:36:21 11 Q Okay. After it came, did you talk to him

11:36:26 12 about having sent that money?

11:36:27 13 A I believe I thanked him.

11:36:28 14 Q Okay. And how much was that first birthday

11:36:35 15 payment?

11:36:36 16 A I don't know the exact amount. It was a few

11:36:38 17 hundreds, though.

11:36:39 18 Q Okay. And you said other people sent money.

11:36:42 19 Were you -- were you fundraising for your

11:36:44 20 birthday?

11:36:45 21 A My fans send me money for my birthday as a

11:36:47 22 gift.

11:36:48 23 Q Okay.

11:36:49 24 A Every year.

11:36:52 25 Q Okay. All right.

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11:36:54 1 So you had this first conversation with Ceasar
11:37:00 2 and Sonstar to talk about how Sonstar's payments to you
11:37:05 3 are being characterized, basically; right?

11:37:07 4 A Yes.

11:37:08 5 Q And -- and I think you said there was two more
11:37:15 6 conversations between the filing of the lawsuit and now.

11:37:19 7 Other than that one about the money, what else
11:37:21 8 did you talk to Sonstar about?

11:37:25 9 A I had a disagreement with a family member.

11:37:30 10 Q Tell me everything you know about that.

11:37:33 11 Who is the family member?

11:37:34 12 A My sister.

11:37:39 13 Q Okay. And what was the nature of the
11:37:41 14 disagreement?

11:37:41 15 A It's just a really tense situation because my
11:37:44 16 biological father is dead and paternity has been
11:37:48 17 established now, but it wasn't prior to his death. So
11:37:50 18 there's just a lot of issues with paternity, basically.
11:37:57 19 So it's caused a strain in our relationship. It affects
11:38:00 20 how, you know --

11:38:02 21 Q And -- and what's your sister's name?

11:38:04 22 A Meshawn.

11:38:06 23 Q Meshawn?

11:38:07 24 A M-E-S-H-A-W-N.

11:38:09 25 MS. DIXON: I am going to object regarding

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11:38:11 1 relevance.

11:38:12 2 MR. O'SULLIVAN: I'm not going to do much on
11:38:12 3 this. I just want to understand the Sonstar angle.

11:38:15 4 BY MR. O'SULLIVAN:

11:38:16 5 Q Did Sonstar know your sister Meshawn?

11:38:18 6 A No.

11:38:19 7 Q But you -- because it was kind of dramatic,
11:38:20 8 you were saying this guy is a mentor and a father, and
11:38:23 9 then you decided to just stop communication; right?

11:38:25 10 A Uh-huh.

11:38:26 11 Q You told me when the lawsuit was filed you
11:38:27 12 made that decision. Yeah?

11:38:29 13 A Yeah.

11:38:29 14 Q Because you didn't want the appearance of
11:38:32 15 colluding.

11:38:32 16 But then you were willing to have a
11:38:34 17 conversation with him about the money issue. Yeah?

11:38:37 18 A Yes.

11:38:37 19 Q And now you were willing to have a
11:38:38 20 conversation with him about some tension with your
11:38:40 21 sister?

11:38:41 22 A Yeah.

11:38:42 23 Q And what did you think Sonstar could do to
11:38:45 24 help with your sister?

11:38:48 25 A It was more for me. Like I said, our

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11:38:50 1 relationship was really faith-based. So I was feeling
11:38:53 2 really low, and it's something that weighs on me a lot;
11:38:56 3 so I really wanted encouragement.
11:39:00 4 Q Okay. And how much time did you spend talking
11:39:07 5 to Sonstar or communicating with him about that
11:39:11 6 situation with your sister?
11:39:13 7 A Not too long. It wasn't a long conversation.
11:39:16 8 Q Like one call. Yeah?
11:39:18 9 A That's what the subsequent calls were about.
11:39:21 10 Q The two subsequent calls were both about your
11:39:23 11 sister?
11:39:24 12 A About my life issues and feeling low and then
11:39:26 13 navigating that, yeah.
11:39:28 14 Q And any discussion on those subsequent two
11:39:31 15 calls about the Tory Lanez case?
11:39:34 16 A No.
11:39:35 17 Q Do you think you'll be communicating in the
11:39:44 18 future with Sonstar about your sister's situation?
11:39:48 19 A Me and my sister are in a better place; so
11:39:52 20 hopefully it will be more positive. It wont come up
11:39:56 21 again.
11:39:57 22 Q Okay. Same kind of questions for Tory Lanez.
11:40:05 23 When is the first time you communicated with
11:40:06 24 Tory Lanez?
11:40:07 25 A 2020.

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11:40:08 1 Q And what were the circumstances?

11:40:10 2 A His message was on Instagram, and it was just

11:40:13 3 like a "Yo, hit me," I believe.

11:40:23 4 Q And what was -- where was that? Was that

11:40:24 5 before the shooting?

11:40:25 6 A After.

11:40:26 7 Q After. Okay.

11:40:26 8 Before the trial?

11:40:31 9 A Yes.

11:40:32 10 Q All right. And were you already out talking

11:40:33 11 about the case?

11:40:34 12 A Yes.

11:40:35 13 Q And when he said, "Yo, hit me," what was --

11:40:38 14 was that on Instagram or?

11:40:39 15 A Yes.

11:40:40 16 Q And what was -- was that a response to

11:40:43 17 something you had already posted?

11:40:44 18 A No.

11:40:45 19 Q Just out of the blue?

11:40:47 20 A Yes.

11:40:49 21 Q Okay. And how did you respond to that?

11:40:52 22 A I followed up with a phone call or -- excuse

11:40:55 23 me. I believe I sent my phone number -- I believe I

11:40:59 24 sent my phone number to him and his father.

11:41:08 25 Q And prior to him saying, "Yo, hit me," you had

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11:41:11 1 no communication with him?

11:41:13 2 A No.

11:41:13 3 Q Did you know him?

11:41:15 4 A No.

11:41:16 5 Q Never met him?

11:41:17 6 A No.

11:41:21 7 Q Did you know of him?

11:41:22 8 A Yes.

11:41:24 9 Q Because of -- of his celebrity of the music

11:41:27 10 business?

11:41:28 11 A Yes.

11:41:30 12 Q And so out of the blue, he puts on Instagram

11:41:32 13 "Yo, hit me" and you send him your phone number?

11:41:35 14 A He sent it in a private message. Yes.

11:41:38 15 Q Okay. Do you have any understanding now of

11:41:40 16 why he picked you out to contact?

11:41:46 17 A No. Because I don't think I was exclusive. I

11:41:48 18 don't think it was special.

11:41:51 19 Q Of all the people in the world, why did he --

11:41:55 20 MS. DIXON: Objection. Speculation.

11:41:55 21 THE WITNESS: I couldn't say.

11:41:55 22 MR. O'SULLIVAN: Huh?

11:41:55 23 THE WITNESS: I couldn't say.

11:41:56 24 BY MR. O'SULLIVAN:

11:41:57 25 Q Well, once you followed up, did you ever ask

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11:41:58 1 him, "Why did you reach out to me"?

11:42:01 2 A I did not ask.

11:42:02 3 Q You don't even know today why, of all the
11:42:04 4 people in the world he could have reached out to, he
11:42:08 5 picked you that day?

11:42:09 6 A No, I don't know.

11:42:11 7 Q And without knowing that, you are okay just
11:42:12 8 sending him your phone number?

11:42:14 9 A Well, yeah. Uh-huh.

11:42:17 10 Q Okay. What happened next in -- in the
11:42:19 11 communication history of Milagro and Tory Lanez?

11:42:23 12 Did he call you?

11:42:28 13 A His father called me.

11:42:29 14 Q Okay. And tell me what was said on that call.

11:42:31 15 A His father called me, and then Tory called at
11:42:34 16 the same time; so we ended up on a three-way call -- me,
11:42:37 17 Tory, and Sonstar.

11:42:39 18 MS. DIXON: I'm going to give a hearsay
11:42:42 19 objection.

11:42:42 20 But you can still answer.

11:42:43 21 MR. O'SULLIVAN: Okay. That's an evidentiary
11:42:46 22 objection for trial.

11:42:51 23 BY MR. O'SULLIVAN:

11:42:51 24 Q By coincidence, Tory and his dad called you at
11:42:53 25 the same time?

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11:42:53 1 A Yeah. I was on the line with Sonstar, and
11:42:55 2 then, yeah, moments later, Tory.

11:42:56 3 Q All right. So you ended up on a three-way
11:42:59 4 call with both of them?

11:43:01 5 A Uh-huh.

11:43:01 6 Q And tell me everything you can say about that
11:43:04 7 conversation. What Tory said? What his father said?
11:43:05 8 And what you said?

11:43:06 9 A Tory was occupied. I don't know what he was
11:43:08 10 doing, but it was a lot of movement, so he didn't say
11:43:11 11 much. He just said, "Hey."

11:43:12 12 And his father made mention of the fact
11:43:19 13 that -- what did he say -- that he had watched my show,
11:43:24 14 and they thought it was funny that different people
11:43:27 15 around them had watched it, and they realized that they
11:43:30 16 all had been watching it, and they kind of came
11:43:32 17 together.

11:43:33 18 He said, "Oh, you watch that too?" You watch
11:43:35 19 that too type of thing; so it was a joke.

11:43:37 20 And then I expressed being sorry about what
11:43:40 21 was going on, and I was referencing the situation. And
11:43:46 22 Daystar -- Tory had to get off the phone. And so me and
11:43:49 23 Sonstar, he prayed at that time on the phone, and then
11:43:52 24 we got off the call. And then --

11:43:53 25 Q Was Tory free at that point?

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11:43:56 1 A Yes.

11:43:56 2 Q Was he in jail?

11:43:57 3 A No. He was free.

11:43:58 4 Q Okay.

11:43:59 5 A This is 2020.

11:44:00 6 Q All right. And -- so Tory was on bail.

11:44:05 7 Do you remember anything that Tory said on the

11:44:07 8 call?

11:44:08 9 A It wasn't much. Like I said, he came on and

11:44:10 10 he said, "Hey," and "Shout-out to you." You know. But

11:44:14 11 like I said, he was really occupied; so it was more so

11:44:17 12 me and his father. And his father initiated the call;

11:44:20 13 so --

11:44:21 14 Q But Tory kind of initiated the whole thing by

11:44:24 15 saying "Yo, hit me up"; right?

11:44:26 16 A Right.

11:44:27 17 Q All right. And you can't remember anything

11:44:31 18 substantive that he said in the call?

11:44:33 19 A Right, no. Honestly.

11:44:34 20 Q But his dad --

11:44:35 21 A Uh-huh.

11:44:36 22 Q -- said he is in a bad situation and let's

11:44:39 23 pray?

11:44:39 24 A No. I said -- I said that I hated the

11:44:43 25 situation that they were in -- or that he was in.

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11:44:45 1 And he said, "Yeah, yeah. God will work it
11:44:49 2 out." And then he was going to pray. He said, "Let's
11:44:52 3 pray."

11:44:54 4 Q All right. And did you have any connection
11:45:02 5 whatsoever to the underlying events of Tory's criminal
11:45:06 6 case, like, the shooting? You weren't there?

11:45:09 7 A No.

11:45:09 8 Q All right. From your criminal justice
11:45:11 9 studies, do you know what a percipient witness is?

11:45:14 10 Somebody who saw whether the light is green
11:45:16 11 or -- different than an expert witness.

11:45:18 12 Do you know what that is?

11:45:19 13 A Okay.

11:45:20 14 Q I'm just asking -- I think I know the
11:45:21 15 answer -- but you are not a witness -- you weren't a
11:45:23 16 witness in the Tory Lanez' criminal case were you?

11:45:25 17 A No.

11:45:26 18 Q And you are not saying you -- you personally
11:45:28 19 observed anything that happened there, are you?

11:45:30 20 A No.

11:45:32 21 Q You don't have any personal knowledge that
11:45:34 22 would be relevant to that, whether he did it or not;
11:45:38 23 right?

11:45:38 24 A No.

11:45:39 25 Q Okay. Prior to talking to Tory and his dad

1 after he -- you were already familiar with the case and
2 the underlying events. Yeah?

3 A Uh-huh. Yes.

4 Q And -- and how -- let me come back to that.

5 I want to ask you what your sort of sources of
6 knowledge are about -- about the case.

7 But, first, in terms of -- of communications
8 where both you and Tory are on talking together, you had
9 that first call where also, dad is on. How many times
10 through today have you later talked to Tory?

11 A Less than 10, I'd say.

12 Q Okay. Less than 10 over five years?

13 A Yeah.

14 Q Okay. And when was the most recent time?

15 A He sent me a happy birthday DM on Instagram.
16 Well, his Instagram page did. I can't say it was him.

17 Q Okay. And that was for this past birthday?

18 A Uh-huh.

19 Q [REDACTED] of '24?

20 A 2024, yeah.

21 Q Okay. And so his Instagram did something.

22 How about an actual interaction where you were
23 in real time either texting or talking to him, when is
24 the most recent time?

25 A I don't recall. I don't recall.

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11:47:09 1 Q Was it in 2024?

11:47:10 2 A I'd have to look. I don't know.

11:47:18 3 Q Well, the last time you actually -- so you had

11:47:21 4 at least -- you said 10 conversations where you talked.

11:47:25 5 What was -- what was talked about the last time that you

11:47:28 6 guys actually communicated in real time?

11:47:30 7 A The last thing I remember that is significant

11:47:41 8 is when I went to Miami to interview his father.

11:47:44 9 Or -- I'm sorry. No. Trial was after that;

11:47:50 10 so I would say trial was the last significant talk we

11:47:52 11 had.

11:47:54 12 Q Okay. Was that during the trial?

11:47:58 13 A Uh-huh.

11:47:59 14 Q In person or on the phone?

11:48:00 15 A In person at the courthouse.

11:48:02 16 Q Okay. So he is -- he is there for his trial,

11:48:04 17 you are there, and you guys were talking in the

11:48:06 18 courthouse?

11:48:07 19 A Yeah.

11:48:08 20 Q Just in -- in the lobby or --

11:48:11 21 A In the lobby I spoke to him. And then on the

11:48:15 22 last day of trial he came up and said something to me.

11:48:18 23 Q What did he say?

11:48:22 24 A It was a -- it was like a greeting type of

11:48:24 25 thing. Like "Hey."

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11:48:25 1 Q What words came out of his mouth?

11:48:27 2 A It wasn't a conversation. He literally walked

11:48:30 3 up to me and said, "Hey," and he gave me a hug. It was

11:48:33 4 the last day before the verdict was read; so I don't

11:48:34 5 know what was behind it.

11:48:35 6 Q So there was no communication?

11:48:37 7 A Right. There wasn't a conversation like that.

11:48:38 8 No.

11:48:39 9 Q But he gave you a hug?

11:48:40 10 A Uh-huh.

11:48:41 11 Q Okay. At that point how many times had you

11:48:46 12 guys -- this is -- you probably had had 10 conversations

11:48:48 13 by that point?

11:48:51 14 A By the time trial started, yeah. Because

11:48:54 15 after that he was in jail.

11:48:56 16 Q Yes. And you weren't able to talk to him

11:48:59 17 while he was in jail?

11:49:00 18 A Well, like I said, I got a message from his

11:49:03 19 Instagram; so -- that was from my birthday last year.

11:49:06 20 Q Okay. So it sounds like the last interaction

11:49:11 21 the last day of trial there wasn't much substance there.

11:49:13 22 When is the last time you had an actual back

11:49:15 23 and forth where words were spoken?

11:49:17 24 A That's when I was saying the Miami --

11:49:19 25 Q Okay. And tell me when was that. As best you

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11:49:23 1 can place it on the calendar.

11:49:25 2 A Maybe -- 2023 maybe. Maybe 2022, 2023. I'm
11:49:29 3 not certain.

11:49:30 4 Q For the trial?

11:49:33 5 A Prior to the trial, yes.

11:49:34 6 Q Okay. And that's my hometown.

11:49:36 7 What -- what did you do in Miami?

11:49:38 8 A I went to Miami to do an interview with
11:49:41 9 Sonstar.

11:49:42 10 Q To -- you were going to interview somebody, or
11:49:44 11 you were going to interview --

11:49:45 12 A I was going to interview Sonstar.

11:49:48 13 Q Okay. On what?

11:49:49 14 A He wanted to speak in relation to the
11:49:53 15 situation.

11:49:56 16 Q That -- that Tory Lanez' case?

11:49:58 17 A Right.

11:49:59 18 Q Or -- and he -- and he -- okay. So was this
11:50:02 19 going to be an episode of your show, or was it some
11:50:05 20 other platform?

11:50:06 21 A No. This particular interview was something
11:50:08 22 that I believe Tory's team was going to handle, because
11:50:13 23 it was all done and everything was handled by them.

11:50:17 24 Q And did this actually happen? Did you do it?

11:50:22 25 A Yes. I conducted the interview.

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11:50:23 1 Q Okay. And did it end up appearing on some
11:50:25 2 media platform?

11:50:26 3 A No. No.

11:50:27 4 Q Was there a live audience?

11:50:29 5 A No.

11:50:30 6 Q Where was the interview?

11:50:33 7 A In Miami, in Tory's studio. There's a -- not
11:50:38 8 a recording -- not for music. It's a -- you know, you
11:50:41 9 can set up -- like, you can decorate a room like a
11:50:44 10 podcast room. It was like that. That's what I mean by
11:50:46 11 "studio."

11:50:47 12 Q Okay. And was it in a residence or a business
11:50:49 13 place?

11:50:50 14 A It was in a building.

11:50:51 15 Q And --

11:50:52 16 A A commercial building.

11:50:53 17 Q -- other than that interview, do you think it
11:50:55 18 was there to make music? What was -- what was the
11:50:57 19 purpose of that space?

11:50:59 20 A Oh, I couldn't say.

11:51:00 21 Q Do you know why -- why that was chosen for the
11:51:03 22 interview? Did they tell you why we're doing it there?

11:51:05 23 A They did not tell me why, no.

11:51:07 24 Q Okay. And did you have -- well, tell me about
11:51:16 25 the conversations you had with Tory about the interview.

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11:51:21 1 A I didn't have a conversation with Tory about
11:51:23 2 the interview.

11:51:23 3 Q All right. I'm still trying to get back to
11:51:26 4 when you had a real substantive back-and-forth with Tory
11:51:28 5 about anything.

11:51:30 6 A Right.

11:51:31 7 Q When is the first -- the last time?

11:51:33 8 A To be honest with you, we didn't have
11:51:35 9 conversations of substance.

11:51:36 10 When I went to Miami, I was there to interview
11:51:39 11 his dad. And while waiting to get to the studio and to
11:51:43 12 go -- I don't know the reasons why we couldn't go yet,
11:51:46 13 but we had to wait -- we went to Tory's home and that is
11:51:49 14 where I was there with him and others.

11:51:51 15 And it was, "Hey, how are you doing?" He told
11:51:55 16 some stories, laughing, joking. So that's the most --
11:51:57 17 that's the latest most significant conversation we had.

11:52:00 18 Q And Tory has a house in Miami?

11:52:03 19 A I believe so.

11:52:04 20 Q And you said you went there?

11:52:05 21 A Yes.

11:52:06 22 Q Is you saw it?

11:52:06 23 A Yes.

11:52:07 24 Q Do you know what neighborhood it's in?

11:52:08 25 A I do not.

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11:52:10 1 Q How much time did you spend there?

11:52:13 2 A A few hours.

11:52:14 3 Q Okay. And you said there were others.

11:52:18 4 Did you know any of the other people there?

11:52:21 5 A No. Besides Sonstar.

11:52:24 6 Q How many other people were there?

11:52:25 7 A I could not say. Less than 10.

11:52:28 8 Q Was there anything that they had in common?

11:52:31 9 Was -- were they all related though Tory's case?

11:52:34 10 A I could not say. I did not recognize anyone

11:52:36 11 there associated with the case.

11:52:38 12 Q Was -- was -- was it just purely social?

11:52:43 13 A At the house? Yes, it was social.

11:52:45 14 Q It was like a party?

11:52:45 15 A It wasn't a party. Just --

11:52:48 16 Q Or hanging out?

11:52:49 17 A Yeah.

11:52:49 18 Q And Tory was there?

11:52:52 19 A Yes.

11:52:54 20 Q And you said, what, roughly, like, three hours

11:52:58 21 while you were waiting around for the studio?

11:53:01 22 A I don't know how many hours it was.

11:53:04 23 Q Did you get to know any of the other people

11:53:05 24 there besides Sonstar and Tory?

11:53:09 25 A Yes.

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11:53:10 1 Q And tell me who -- who made an impression on
11:53:12 2 you from the rest of that crowd?

11:53:14 3 A I don't know her name, but there was a young
11:53:16 4 lady who I met, who seemed very nice and sweet.

11:53:21 5 Q You don't remember her name?

11:53:22 6 A I don't. Sorry.

11:53:23 7 Q And did you have an understanding of why she
11:53:25 8 or the other people were there that day? Like, what
11:53:28 9 their connection was to the event?

11:53:30 10 A No. And I don't believe them -- they weren't
11:53:33 11 associated with my interview with Sonstar.

11:53:34 12 But no, I don't know why they were there.

11:53:37 13 Q Okay. So you think you and Sonstar just kind
11:53:39 14 of walked in on a gathering that was going to happen
11:53:42 15 anyway -- it was already there?

11:53:43 16 A Uh-huh.

11:53:44 17 Q Okay. And within that period of time that you
11:53:47 18 were all together, how much back-and-forth was there
11:53:50 19 directly between you and Tory?

11:53:53 20 A Limited. Like I said, he was telling stories;
11:53:58 21 so kind of was like a viewer sitting on the couch,
11:54:01 22 watching. There was a documentary special that we
11:54:04 23 played; so we all, as a group, you know, commented on
11:54:07 24 that.

11:54:08 25 Q What was the name of that documentary special?

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11:54:10 1 A It was, I believe, it was a Kanye West
11:54:13 2 documentary. It came in on some platform.

11:54:20 3 Q Kanye West. And you guys watched part of it?
11:54:23 4 The whole thing?

11:54:23 5 A Part of it.

11:54:24 6 Q Do you remember what -- what the part that
11:54:25 7 everyone watched, was commenting about?

11:54:27 8 A I don't.

11:54:28 9 Q But people were talking about that? You do
11:54:32 10 remember generally that that --

11:54:33 11 A Right, yeah.

11:54:34 12 Q And you can't remember anything about what --
11:54:36 13 did they like it? Did they hate it? Were they --

11:54:38 14 A Yes, they liked it. You know, we talked about
11:54:40 15 the music and -- as they were playing clips of the music
11:54:43 16 in the documentary. You know, people pause out to sing
11:54:46 17 it or dance, you know, have a moment, and stuff like
11:54:49 18 that. And -- and speaking to Kanye's artistry, and how
11:54:53 19 amazing of an artist that he is.

11:54:55 20 Q Okay. And, again, so as best you can recall
11:55:01 21 it, other than just being around for this -- this --
11:55:05 22 people hanging out --

11:55:07 23 A Uh-huh.

11:55:07 24 Q -- if you were to bring it down to -- to
11:55:11 25 Milagro and Tory discussing whatever you might have

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11:55:13 1 discussed one-on-one, is there anything you can remember
11:55:16 2 talking to him? Did you talk about the case?

11:55:21 3 A Me and Daystar have never discussed his case.

11:55:24 4 Q All right. And -- and if you had to mush it
11:55:32 5 all together, all the times that you and Daystar have
11:55:35 6 exchanged words, how much conversation is that? Is it
11:55:38 7 more than an hour?

11:55:40 8 A Probably.

11:55:41 9 Q All right. So how did you two fill that out?
11:55:44 10 What were the subjects that you did talk about if you
11:55:46 11 didn't talk about the case?

11:55:47 12 A Okay. So there was an initial time that he
11:55:50 13 hit me up, that we spoke on the three-way with his
11:55:53 14 father. Months later --

11:55:58 15 Q But he didn't say anything on that call,
11:55:59 16 right, other than "Yo"?

11:56:00 17 A Right. Like I said, he was occupied.

11:56:03 18 And then he wrote me on Instagram, in my DMs,
11:56:08 19 saying that he wanted to do a show, a podcast show, and
11:56:13 20 he was thinking about maybe doing one with me and
11:56:17 21 another podcaster DJ Akademiks.

11:56:22 22 Q Okay. And -- and do you recall when -- what
11:56:24 23 year this was? Or at least in reference to the trial.

11:56:31 24 A Probably 2021. Maybe.

11:56:33 25 Q Okay. And so he -- he and how did that

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11:56:37 1 happen? You guys actually spoke?

11:56:38 2 A No. He sent a DM and -- he sent a DM, and I
11:56:42 3 believe he spoke on it publicly. I think he tweeted.
11:56:45 4 Yeah. He tweeted and said that he wanted to do a show
11:56:48 5 with me and Akademiks. Me and him never spoke about it
11:56:51 6 or got into any details. It never materialized into
11:56:55 7 anything.

11:56:55 8 Q Okay. So I'm still trying to fill an hour of
11:56:58 9 conversation here. This is a DM.

11:57:01 10 Did that podcast happen?

11:57:02 11 A No.

11:57:03 12 Q Why not?

11:57:05 13 A I couldn't say.

11:57:08 14 Q Did you try to make it happen?

11:57:10 15 A No. Not, on my end.

11:57:12 16 Q Why not?

11:57:12 17 A Because, you know, celebrities and
11:57:15 18 Hollywood -- people say a lot of things. I didn't put
11:57:18 19 all my eggs in that basket.

11:57:21 20 Q Okay. Did you want to do it?

11:57:28 21 A I was open to the idea of trying it out.

11:57:31 22 Q Okay. And -- and did you take any steps to
11:57:33 23 try to make it happen?

11:57:35 24 A No.

11:57:36 25 Q Do you have any understanding of why it didn't

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11:57:40 1 happen?

11:57:40 2 A No.

11:57:43 3 Q What -- what is your connection, if any, to
11:57:46 4 Akademiks, DJ Akademiks?

11:57:50 5 A DJ Akademiks interviewed me after I did trial
11:57:54 6 coverage.

11:57:56 7 Q Was that during the trial?

11:58:02 8 A My interview with him was after.

11:58:04 9 Q After?

11:58:04 10 A The trial.

11:58:05 11 Q It was after the verdict?

11:58:06 12 A Yes.

11:58:07 13 Q Okay. And what platform was that on? There
11:58:13 14 may be many. How was that put out?

11:58:15 15 A I believe -- I'm aware of him putting it on
11:58:18 16 Spotify. I'm not certain what all he streams from.

11:58:21 17 Q Okay. And when he is not interviewing you on
11:58:24 18 Spotify, what does DJ Akademiks do?

11:58:27 19 A I do not know. He is a streamer. I know
11:58:29 20 that, but other than that, I don't know.

11:58:31 21 Q And "streamer" means he just -- he goes live
11:58:34 22 and just talks?

11:58:35 23 A He -- he -- my point of reference with him, he
11:58:38 24 is speaking about trending topics.

11:58:40 25 Q Uh-huh. Do you associate him with things

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11:58:44 1 other than commentary on the Tory Lanez' case?

11:58:49 2 A Yes.

11:58:50 3 Q Like what are some of his big issues --

11:58:51 4 DJ Akademiks?

11:58:53 5 A DJ Akademiks, for me, is most ingrained in the

11:58:58 6 rap culture in the Chicago beefs and --

11:59:03 7 Q Chicago what?

11:59:04 8 A Like Chicago -- the Chicago "drill" scene.

11:59:07 9 Akademiks has been blamed for causing issues within that

11:59:10 10 community. So that's more so what I know him for. He

11:59:13 11 has a big voice in hip-hop.

11:59:15 12 Q Okay. I didn't know some of these words.

11:59:17 13 Did you say "drill" scene?

11:59:19 14 A Yeah. Drill music.

11:59:20 15 Q Okay. So that's a genre of -- of rap?

11:59:22 16 A Yes. Or of music.

11:59:24 17 Q Of music?

11:59:25 18 A Yeah.

11:59:25 19 Q All right. So he is -- he is a commentator in

11:59:28 20 the music business?

11:59:28 21 A Yes.

11:59:29 22 Q All right. And you knew of him before any of

11:59:31 23 this Tory Lanez stuff?

11:59:33 24 A Yes. He is a really big streamer.

11:59:35 25 Q All right. And do you -- do you -- have you

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11:59:36 1 in the past, prior to the Tory Lanez situation, followed
11:59:40 2 him or?

11:59:40 3 A Yes.

11:59:41 4 Q Yes. Okay. And then, at some point, Tory
11:59:44 5 Lanez says, "Hey, you should do a podcast with
11:59:46 6 DJ Akademiks about my case"; right?

11:59:49 7 A No.

11:59:50 8 Q Oh. What was the thing we were talking about
11:59:51 9 where he hit you up and said --

11:59:53 10 A So, Tory had Quarantine Radio, which was a
11:59:58 11 streaming show on Instagram that got a lot of attention
12:00:03 12 and, I believe it was along the vein of that. There was
12:00:05 13 no -- in any way, any mention of "Let's do a show about
12:00:08 14 my case." He never gave an idea of it. But I believed
12:00:14 15 it to be something like an extension of Quarantine
12:00:16 16 Radio.

12:00:18 17 Q Okay. So you -- the two of you would come on
12:00:20 18 his -- his Quarantine Radio?

12:00:22 19 A He wanted to do something new, but like I
12:00:25 20 said, it never progressed; so I don't know what that
12:00:27 21 would have looked like for him.

12:00:29 22 Q All right. Am I right that those
12:00:36 23 conversations -- there wasn't -- there wasn't really any
12:00:40 24 direct back and forth between you and Tory about
12:00:42 25 anything other than the message; right? There wasn't a

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12:00:46 1 real time conversation there about this podcast?

12:00:50 2 A No. He DM'd me about it.

12:00:52 3 Q All right. Going back in time from there,

12:00:53 4 when was the last time you can recall having a

12:00:56 5 conversation with Tory about anything substantive? You

12:00:59 6 told me you never talked to him about the case; right?

12:01:01 7 A Right. So I would say in -- like, of

12:01:05 8 substance of -- the Miami that I told you, and then we

12:01:08 9 had a brief interaction on the first day of trial. And

12:01:10 10 then --

12:01:12 11 Q All right. Miami was you are in a group.

12:01:14 12 A Uh-huh.

12:01:15 13 Q And you are watching all this, but there's not

12:01:17 14 really -- you couldn't tell me anything substantive that

12:01:19 15 it was just you and Tory talking about; right?

12:01:21 16 A No.

12:01:22 17 Q And -- sounds like any substance about the

12:01:28 18 case all was through his dad. Yeah?

12:01:33 19 A No. Could you --

12:01:37 20 Q Well, you -- you didn't talk to Tory about the

12:01:39 21 case?

12:01:39 22 A Right.

12:01:39 23 Q You did talk to his dad about the case, at

12:01:41 24 least on and off over time; right?

12:01:43 25 A Yes.

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12:01:44 1 Q Okay. Do you have the sense that Tory was
12:01:46 2 communicating through his dad?

12:01:48 3 A No.

12:01:49 4 Q Okay. All right. So going back, is there --
12:01:57 5 is there a substantive Tory-Milagro conversation about
12:02:01 6 anything? Like, what's the longest single conversation
12:02:05 7 where it was the just the two of you were talking?

12:02:08 8 A The -- the first day of trial he said, "Today
12:02:12 9 is the day that they're going to paint me out to be a
12:02:15 10 monster."

12:02:15 11 And I said, "No. You are not, and everything
12:02:19 12 will be okay."

12:02:25 13 Q And "Today is the day they're going to paint
12:02:29 14 me out to be a monster."

12:02:29 15 No, you are going to be okay.

12:02:32 16 And -- and where was that? Literally right in
12:02:39 17 the courtroom?

12:02:39 18 A Uh-huh.

12:02:40 19 Q Inside the courtroom?

12:02:41 20 A Uh-huh.

12:02:41 21 Q And he was walking, and he saw you and he said
12:02:43 22 that what he said?

12:02:44 23 A No. We went into the courtroom and we were
12:02:46 24 seated, and I was close enough to him, and he said it to
12:02:49 25 me.

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12:02:49 1 Q He was, I assume, inside the well of the
12:02:53 2 courtroom, and you -- like, you were in the first row
12:02:54 3 maybe?

12:02:54 4 A He had -- I don't know what the "well" is
12:02:56 5 but --

12:02:57 6 Q Like, the part where the action is. On the --

12:03:01 7 A He was behind that gate. So we all -- people
12:03:02 8 were just filing into the courtroom, trying to be
12:03:04 9 seated, and we were seated so prior to him crossing that
12:03:07 10 threshold.

12:03:08 11 Q And he said to you "Today's the day they're
12:03:11 12 going to paint me out as a monster"?

12:03:13 13 A Yes.

12:03:13 14 Q And you said, "No. I don't think that will
12:03:15 15 happen"?

12:03:16 16 A Right.

12:03:16 17 Q And that was before any evidence or anything
12:03:19 18 came in?

12:03:21 19 A What do you mean?

12:03:22 20 Q What was before the action started in the
12:03:23 21 courtroom. That was --

12:03:25 22 A It was prior to trial. Right, right.

12:03:26 23 Q Right. Did he say why he thought that, or
12:03:30 24 what the monster stuff was going to be?

12:03:32 25 A No. That's all he said.

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12:03:35 1 Q And why did you think that wasn't going to
12:03:37 2 happen? Why did you say -- or you were just trying to
12:03:39 3 be comforting?
12:03:40 4 A I was trying to be comforting, and also didn't
12:03:42 5 believe him to be guilty. At that point.
12:03:45 6 Q Okay. And why did you have a view one way or
12:03:54 7 another about whether he was guilty? Like, you didn't
12:03:56 8 know. You weren't there; right?
12:03:58 9 A I was not there.
12:03:59 10 Q Okay. And so -- but you did have a view,
12:04:01 11 before the trial started, that he wasn't guilty?
12:04:04 12 A I did believe that.
12:04:05 13 Q And I want to understand the sources of, like,
12:04:20 14 the reason you thought that?
12:04:21 15 A Uh-huh.
12:04:22 16 Q You weren't personally exposed to any of the
12:04:24 17 evidence before the trial; right?
12:04:26 18 A No.
12:04:27 19 Q And you didn't see what happened that night;
12:04:30 20 right?
12:04:30 21 A No.
12:04:31 22 Q You didn't hear anything, smell anything?
12:04:33 23 A No.
12:04:34 24 Q Did Tory ever tell you what happened that
12:04:37 25 night?

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12:04:38 1 A No.

12:04:39 2 Q Did anybody else who was there tell you what
12:04:42 3 happened that night?

12:04:43 4 A No.

12:04:43 5 Q Did any police officers talk to you?

12:04:48 6 A No.

12:04:48 7 Q Did any investigators from the police talk to
12:04:52 8 you?

12:04:52 9 A No.

12:04:53 10 Q Did you personally, prior to the trial, see
12:05:00 11 any of the forensic evidence?

12:05:01 12 A No.

12:05:02 13 Q Well, going back to your sort of criminal
12:05:05 14 justice time, when you were looking how to be an
12:05:08 15 investigator and all that stuff, what -- what did you
12:05:11 16 have that would cause you one way or the other to have a
12:05:15 17 belief that he was not guilty?

12:05:17 18 A So --

12:05:19 19 Q I'm talking about prior to the trial when you
12:05:21 20 just had that conversation?

12:05:22 21 A So -- of course. So I was covering another
12:05:25 22 situation. There was a death of a woman and a child in
12:05:28 23 Houston, and I was live on air covering that. And the
12:05:33 24 news broke on "TMZ" that there had been an incident. At
12:05:36 25 the time, the information was limited. So when I heard

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12:05:40 1 it, I said, "Well, if he did something, then he should
12:05:42 2 go to jail." Because harming a woman that way, or in
12:05:45 3 any way, is not okay. And so --
12:05:50 4 Q That was your first reaction?
12:05:51 5 A Yes.
12:05:52 6 Q If he did it, he should go to jail?
12:05:54 7 A Absolutely. Absolutely.
12:05:55 8 Q And what details had you heard at that point?
12:05:57 9 A Just the "TMZ" article.
12:05:59 10 Q Did that talk about "Dance, bitch"? No?
12:06:02 11 A I couldn't say.
12:06:03 12 All I knew, there was video footage of
12:06:05 13 Megan Pete walking backwards with bloodied feet, and
12:06:10 14 they said there was an arrest and things of that nature.
12:06:12 15 I don't -- I don't recall exact details. I don't know
12:06:13 16 if that had been published yet. But just the first
12:06:17 17 video of them out of the vehicle with cops and a
12:06:20 18 situation of some sort.
12:06:21 19 Q Right. And so -- so you saw "TMZ," and your
12:06:25 20 first reaction was if he did that, he should go to jail?
12:06:30 21 A Yes.
12:06:30 22 Q If he shot at a woman and said, "Dance,
12:06:32 23 bitch"; right?
12:06:33 24 A Yes.
12:06:33 25 Q He should go to jail for that?

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12:06:36 1 MS. DIXON: Objection. Assuming facts not in
12:06:37 2 evidence. Because she said he didn't know if he said,
12:06:39 3 "Dance, bitch."

12:06:40 4 MR. O'SULLIVAN: It is just a deposition.

12:06:41 5 MS. DIXON: I know, but you are putting words
12:06:43 6 in her mouth. She didn't say, "Dance, bitch," just for
12:06:46 7 clarity.

12:07:00 8 BY MR. O'SULLIVAN:

12:07:01 9 Q Did something -- well, you first hear the
12:07:02 10 report -- obviously, you have an open mind because you
12:07:04 11 are saying, "If he did this, he should pay"; right?

12:07:07 12 A Yes.

12:07:07 13 Q And then what happens prior to the trial to
12:07:11 14 have you conclude he didn't do this?

12:07:14 15 A Okay.

12:07:15 16 Q What are the sources you have?

12:07:16 17 A So, in the first few days after the incident,
12:07:21 18 it was Kelsey's mother -- Kelsey Harris, who was in the
12:07:25 19 vehicle.

12:07:25 20 Q Okay.

12:07:26 21 A Her mother and her sister went on social media
12:07:28 22 and they "cast out" on Megan, and that is what made me
12:07:30 23 initially "cast out."

12:07:32 24 Q Did you know either of them -- Kelsey's mother
12:07:34 25 or sister?

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12:07:35 1 A No.

12:07:35 2 Q Do you know Kelsey?

12:07:36 3 A No.

12:07:38 4 Q All right. So -- so what did you

12:07:42 5 understand -- did you have an understanding of -- of how

12:07:45 6 Kelsey fit into the underlying events at that point?

12:07:53 7 A No. I just knew her proximity to Megan, as an

12:07:55 8 assistant. And I saw her, in that video, get out of the

12:07:59 9 car; so I knew that she had been there.

12:08:01 10 Q Uh-huh. All right. So you have an open mind.

12:08:03 11 And then, on social media, the mom and the sister of one

12:08:05 12 of the people who were there put out something.

12:08:08 13 Do you remember what the something was?

12:08:10 14 A They said something to the effect of "This is

12:08:13 15 where loyalty gets you. My daughter has never been in

12:08:16 16 trouble. This is because of Megan's stupid decisions."

12:08:18 17 And I asked --

12:08:21 18 Q That's pretty vague?

12:08:22 19 A Is it? Oh, in terms of per her statement?

12:08:26 20 Q So they're saying -- they didn't say she did

12:08:28 21 or didn't do anything, did they -- Kelsey?

12:08:31 22 A I couldn't say. The messages that I'm

12:08:34 23 referencing -- or what I saw were them saying they were

12:08:36 24 worried for Kelsey and they -- I believe they, verbatim,

12:08:40 25 said, "That it was Megan's stupidity that caused this,"

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12:08:43 1 verbatim. I think -- I think that's what they said.

12:08:46 2 Q All right. And did that change your opinion
12:08:53 3 or your belief as to whether Tory pulled the trigger?

12:08:58 4 A At that time, there was not an accusation. At
12:09:00 5 that time, we didn't even know there had been a
12:09:02 6 shooting. We just knew there was an incident. And it
12:09:06 7 made me wonder "Wait, well, what happened?"

12:09:08 8 When they said that they place the blame on
12:09:11 9 Megan, I had seen Megan hurt getting out of the vehicle;
12:09:13 10 so I was confused. And it was supposed to be her best
12:09:19 11 friend; so I was just really confused.

12:09:21 12 Q Uh-huh. I should have asked you, have you
12:09:27 13 ever had a conversation with Megan?

12:09:28 14 A No.

12:09:29 15 Q Okay. Has -- has Megan ever done anything to
12:09:38 16 you personally? Like, that hurt you? Do you have a
12:09:43 17 grudge with her? A beef with her?

12:09:45 18 A I believe she's done something against me
12:09:46 19 personally.

12:09:50 20 Q Okay. And what is that?

12:09:51 21 A She has -- or her team has reported my
12:09:53 22 Twitter. That was documented by a journalist. And --

12:10:00 23 Q Do you have any sense of when that was?

12:10:02 24 A I'm sorry. I don't.

12:10:04 25 Q Was it late -- like after all the court case?

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12:10:07 1 A It was prior to trial. It was prior to trial.

12:10:10 2 Q Okay. You put something up on Twitter about

12:10:12 3 Megan?

12:10:13 4 A About the case.

12:10:16 5 Q And you think Megan's team reached out to

12:10:19 6 Twitter and got them to take it down?

12:10:20 7 A The journalist reported that Megan's team told

12:10:22 8 them that they reported a series of tweets and got my

12:10:25 9 Twitter locked.

12:10:26 10 Q Okay. And so Twitter, obviously, agreed there

12:10:27 11 was a problem with the tweets; right?

12:10:30 12 MS. DIXON: Objection. Calls for speculation.

12:10:32 13 THE WITNESS: I wouldn't say so because they

12:10:34 14 did not terminate my page. And after they looked at it,

12:10:36 15 I was given access back to my page.

12:10:38 16 BY MR. O'SULLIVAN:

12:10:39 17 Q Okay. And did you put those tweets back up?

12:10:41 18 A I cannot say what happened with them,

12:10:42 19 honestly.

12:10:43 20 Q Okay. Do you remember what you had tweeted

12:10:45 21 that Megan's team objected to?

12:10:47 22 A Not at this time, no.

12:10:49 23 Q Did you ever put things out as if it was facts

12:10:54 24 about the Megan trial -- or the Megan situation when it

12:10:56 25 was really just your opinion?

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12:10:58 1 A No. I always asked questions.

12:11:02 2 Q Uh-huh. Okay. And so the sister and the mom
12:11:08 3 of the friend cast doubt.

12:11:10 4 Anything else happened between then and the
12:11:12 5 first day of trial when you went from "If he did it, he
12:11:16 6 should pay" to "You are not a monster, and you are not
12:11:20 7 going to go to jail"?

12:11:22 8 A Uh-huh. Right. So Kelsey's mother and sister
12:11:23 9 "cast out," and I started to question things. And then
12:11:27 10 Megan made a public statement that she was a victim of a
12:11:31 11 crime against her. She mentions a shooting, and I was
12:11:37 12 confused. Because when she went to the hospital, per
12:11:40 13 what I had learned at school, if anybody comes into the
12:11:42 14 hospital with a gunshot or a stab wound, even if it's
12:11:45 15 self-inflicted, that must be reported.

12:11:47 16 And per my understanding, when she went to the
12:11:51 17 hospital, even though Daystar was in jail and
12:11:53 18 everything, it wasn't reported that they -- they didn't
12:11:56 19 say anything about that until, like, October and said
12:11:58 20 they were accusing him and da, da, da. So I felt like
12:12:01 21 it was fishy that police were not called there and that
12:12:04 22 something didn't follow up then.

12:12:07 23 Q Okay. But I mean, nobody at the hospital had
12:12:10 24 a job of keeping you up to speed on what they did;
12:12:12 25 right? Like --

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12:12:13 1 A Well, it was public record. So as we were
12:12:15 2 reading and going through these things, I posed that
12:12:17 3 question. Well, this is what is supposed to happen in a
12:12:19 4 situation like this. It doesn't appear as though it
12:12:21 5 did.

12:12:24 6 Q But you didn't have any information. You were
12:12:25 7 just asking questions?

12:12:26 8 A Right. Right.

12:12:28 9 Q At any point, between when you think "If he
12:12:34 10 did it, he should pay" to you get to the first day of
12:12:37 11 trial and you are telling him, "You are not a monster,"
12:12:40 12 did you do anything besides ask questions? Did you get
12:12:42 13 any actual information from somebody who has evidence in
12:12:45 14 the case?

12:12:46 15 A No.

12:12:47 16 Q All right. So whatever changed there, it
12:12:51 17 wasn't based on new information?

12:12:54 18 A No. It was based on what I was seeing.

12:12:56 19 Q That's what I'm trying to understand. So you
12:12:58 20 start out, and you say, "I don't know anything. I don't
12:12:59 21 even know that there's a shooting"?

12:13:01 22 A Right.

12:13:01 23 Q You get to a point where not only is there
12:13:03 24 alleged to be a shooting.

12:13:05 25 A Uh-huh.

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12:13:05 1 Q But the guy is on trial.

12:13:07 2 A Right.

12:13:08 3 Q Felonies.

12:13:08 4 A Uh-huh.

12:13:09 5 Q And you are in court. You have whatever

12:13:11 6 the -- the friend's mother and sister said, but it was

12:13:15 7 pretty vague; right?

12:13:16 8 A Yeah.

12:13:18 9 Q What is the information you get between then

12:13:20 10 and the first day of trial, actual factual information

12:13:23 11 that would cause you to feel differently about whether

12:13:25 12 he shot her?

12:13:26 13 A Okay. The most substantial thing that took
12:13:29 14 place was a conversation between me and Tamika Mallory.

12:13:34 15 Q Tamika Mallory. Okay.

12:13:35 16 A Tamika Mallory challenged my viewpoint and
12:13:38 17 she -- she encouraged me to go read, and I said, "Okay."
12:13:44 18 And I -- there was a preliminary hearing that took place
12:13:48 19 in December of 2021.

12:13:50 20 Q Yes.

12:13:50 21 A And I obtained the transcripts.

12:13:54 22 Q Yes.

12:13:54 23 A And I read through them. And that is when I
12:13:56 24 absolutely felt like, "Wait a minute, I don't think he
12:13:59 25 is guilty."

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12:14:01 1 Q And in that sense, you came to a different
12:14:03 2 conclusion than the judge; right? It was a judge there?
12:14:07 3 A No. This is me streaming.
12:14:09 4 Q No, I understand. But you are saying I took
12:14:11 5 some information that was presented to the judge at the
12:14:13 6 preliminary hearing.
12:14:14 7 A Uh-huh.
12:14:15 8 Q And the judge obviously decided he is going to
12:14:17 9 stay for trial. It's enough. And you said, "No. I
12:14:19 10 read it the other way"?
12:14:22 11 A When I read it, all I thought was something is
12:14:24 12 not right here. That's what I thought.
12:14:26 13 Q That's a question; right?
12:14:27 14 A What do you mean?
12:14:28 15 Q That's not a fact; right? That's a feeling or
12:14:30 16 something.
12:14:31 17 A Right.
12:14:32 18 Q That's not a fact?
12:14:32 19 A That's all my opinion is, right.
12:14:34 20 Q Okay. And I'm trying to distinguish between
12:14:37 21 opinions and facts.
12:14:38 22 A Right, right. I always just questioned what
12:14:40 23 the paperwork said. So, once I read the paperwork and
12:14:43 24 it said there was an altercation, now, I felt like that
12:14:46 25 was a motive.

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12:14:51 1 Q Okay. But no new facts?

12:14:55 2 A I felt like now those were facts and that was
12:14:58 3 in court. Under penalty of perjury, everybody was
12:14:59 4 supposed to tell the truth. So the things that were
12:15:01 5 revealed there, I accepted them as a fact -- that there
12:15:03 6 had been a fight, and that -- you know, the situation as
12:15:06 7 it was presented.

12:15:08 8 Q Did Tory ever deny to you that he shot the
12:15:11 9 gun?

12:15:12 10 A We never spoke about the situation.

12:15:14 11 Q Okay.

12:15:18 12 MR. O'SULLIVAN: Okay. All right. What
12:15:21 13 should I do here? It's 12:15. I -- we're going to
12:15:24 14 start doing some of these tweets. Should we take a
12:15:27 15 break now or --

12:15:29 16 MS. HAYRAPETIAN: Court reporter is asking for
12:15:30 17 a break.

12:15:30 18 MR. O'SULLIVAN: What's your -- oh, you want a
12:15:30 19 break?

12:15:30 20 Yes. All right. Let's take -- should we take
12:15:30 21 our lunch break now?

12:15:30 22 THE VIDEOGRAPHER: Let's go off record. Time
12:15:34 23 is 12:15. We're going off -- sorry.

12:15:38 24 MR. O'SULLIVAN: Wait. I might go a few more
12:15:41 25 minutes, if we have it.

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12:15:46 1 MS. HAYRAPETIAN: We can take a break.

12:15:47 2 MR. O'SULLIVAN: Okay. Should we take our

12:15:47 3 lunch break? Food is here. We'll set them up and come

12:15:50 4 back in -- I prefer shorter but take half-hour? You

12:15:52 5 want 40 minutes?

12:15:54 6 MS. DIXON: 40 minutes.

12:15:55 7 MR. O'SULLIVAN: Sure.

12:15:55 8 Is that okay?

12:15:56 9 THE WITNESS: Yeah.

12:15:58 10 MR. O'SULLIVAN: Okay. So you have that room.

12:16:02 11 And anything else you need, we'll get for you.

12:16:05 12 THE VIDEOGRAPHER: The time is 12:16. We're

12:16:10 13 going off the record.

12:59:09 14 (Recess was taken.)

01:11:19 15 THE VIDEOGRAPHER: The time is 1:11. We're

01:11:28 16 back on the record.

01:11:37 17 MR. O'SULLIVAN: Okay.

01:11:38 18 Okay. So I'm going to mark as the first

01:11:40 19 Exhibit 40; right? 41? 40?

01:11:42 20 MS. HAYRAPETIAN: Or 40, I think.

01:11:43 21 (Exhibit 40 was marked for identification.)

01:11:43 22 MR. O'SULLIVAN: I'll give it to your lawyer.

01:11:54 23 And we're going to play the video --

01:11:54 24 Ms. Cooper.

01:11:55 25 MS. HAYRAPETIAN: There's no video. There's

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01:11:55 1 no video for this one.

01:11:57 2 MR. O'SULLIVAN: Got it. Okay. A tweet. All

01:11:58 3 right.

01:11:58 4 So the witness has the marked exhibit.

01:12:01 5 You said 40; right?

01:12:05 6 MS. HAYRAPETIAN: Uh-huh.

01:12:06 7 MR. O'SULLIVAN: For the record, I've marked

01:12:07 8 as Exhibit 40 a one-page document. It appears to be a

01:12:11 9 depiction of a post from Milagro, says what it says.

01:12:22 10 BY MR. O'SULLIVAN:

01:12:22 11 Q My first question to you, is -- is this

01:12:26 12 something you posted to social media -- Exhibit 40?

01:12:29 13 A I believe so.

01:12:30 14 Q All right. And it says, at the bottom,

01:12:32 15 "7:12 PM, December 24th, 2023, 52.3K views."

01:12:40 16 Is all that accurate as far as you know?

01:12:42 17 A As far as I know.

01:12:43 18 Q All right. And can you just read your tweet

01:12:46 19 into the record?

01:12:47 20 A Yes. [As read] Megan wants to know what she

01:12:49 21 has to do to stop being posted on certain outlets, and

01:12:52 22 then she says she's going to Cardi B. y'all hoes. My

01:12:56 23 suggestion would be to just get over it or go away.

01:12:59 24 Cardi won her case because Tasha K. handed it to her.

01:13:02 25 Other than that, you are going to get posted. Oh, well.

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01:13:07 1 Q Okay. Had something happened before this that
01:13:18 2 caused you to send -- to put it post out at this time?
01:13:23 3 A Something had to have happened, but I couldn't
01:13:24 4 say what exactly.
01:13:27 5 Q Well, this -- this, quote, "Cardi B. y'all,"
01:13:30 6 whatever -- H-S.
01:13:32 7 Is that from some other post that you read?
01:13:39 8 A No. I would imagine, because I see that
01:13:41 9 there's a timer, four seconds, maybe it was a video, a
01:13:45 10 live she did.
01:13:47 11 Q You are saying the little four seconds down at
01:13:49 12 the bottom means that this picture is actually a
01:13:52 13 four-second video?
01:13:55 14 A I believe so.
01:13:55 15 Q And is that of Megan crying?
01:13:58 16 A Of her touching her face. I don't see her
01:13:59 17 crying. Not to me.
01:14:01 18 Q Okay. And did you, in fact, watch a video of
01:14:05 19 her saying, "What do I have to do to stop getting posted
01:14:07 20 on by you?"
01:14:09 21 A I believe so.
01:14:10 22 Q Okay. And you said, "What she needs to do is
01:14:13 23 just get over it or go away"?
01:14:14 24 A Yes.
01:14:15 25 Q What does "go away" mean? What did you mean?

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01:14:20 1 A What I mean is there were so many different
01:14:23 2 major outlets speaking about the situation,
01:14:24 3 contradicting her claims and calling her an outright
01:14:27 4 liar -- Joe Budden, Akademiks. Just everywhere you
01:14:31 5 turned, everybody was questioning her.

01:14:32 6 So when she was in the live -- or asking what
01:14:37 7 can she do and I'm saying go away, stop talking about
01:14:39 8 it. Move on. She said it publicly, she was going to
01:14:41 9 move on. Move on. Or go have peace.

01:14:44 10 What do you want to do? You want to be in the
01:14:46 11 industry. Or I don't know.

01:14:47 12 Q I see. But the solution wasn't for people to
01:14:50 13 stop saying all this stuff? Including you?

01:14:53 14 A Saying what stuff?

01:14:54 15 Q Whatever she's complaining about. Calling her
01:14:56 16 a liar?

01:15:03 17 A Could you ask me again? I'm sorry.

01:15:05 18 Q Yes. She -- the thing you are reacting to is
01:15:08 19 Megan saying, "What do I need to do to get people to
01:15:13 20 stop posting"; right?

01:15:14 21 A Uh-huh. Right.

01:15:14 22 Q And the things they're posting are, among
01:15:16 23 other things, posted by people like you saying, "She's a
01:15:18 24 liar and she lied at the trial"; right?

01:15:22 25 A I don't know exactly who she was talking to,

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01:15:23 1 but I would imagine maybe those are some of the things
01:15:26 2 she's upset about.

01:15:27 3 Q Yes. At least you know that you said that
01:15:29 4 about her before she said, "What do I need to do to stop
01:15:31 5 this."

01:15:32 6 A Do I know that I said that?

01:15:33 7 Q Yeah.

01:15:33 8 A That she was a liar?

01:15:34 9 Q Yes. And that she lied at the trial?

01:15:38 10 A I have called her a liar in terms of saying
01:15:40 11 she lied at the trial? I'm not going to say I said
01:15:43 12 that.

01:15:44 13 Q You are denying you said that? You said that
01:15:46 14 many times; right?

01:15:48 15 A I would need to see what you are referencing
01:15:50 16 or see exactly what you are talking about.

01:15:52 17 Q Okay. But sitting here today, telling the
01:15:54 18 truth, you can't recall having said, in a public place,
01:15:58 19 that Meg lied at the trial?

01:16:01 20 A I did not say that. I posed a question.

01:16:04 21 Q Okay. You never affirmatively called her a
01:16:08 22 liar?

01:16:08 23 A I have called Megan a liar.

01:16:10 24 Q What am I missing?

01:16:11 25 A That Megan has lied many times; so I've called

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01:16:13 1 her a liar for different reasons.

01:16:15 2 Q All right. But you are saying you never
01:16:16 3 called her a liar. You never said she lied at the
01:16:19 4 trial?

01:16:19 5 A I posed the question: Did she lie at trial.

01:16:21 6 Q And why did you pose that question?

01:16:23 7 A Because there was witness testimony or expert
01:16:26 8 testimony that she had nerve damage from her -- I'm
01:16:29 9 sorry -- Megan said she had nerve damage. The expert
01:16:31 10 said she did not. That's a contradiction to me.

01:16:34 11 Q But you just read part of the stuff; right?

01:16:36 12 A I was there.

01:16:36 13 Q You don't know the whole story was?

01:16:38 14 A What do you mean?

01:16:39 15 Q Did you see the medical evidence?

01:16:40 16 A I saw a medical report.

01:16:42 17 Q Did you see the medical report? Did you see a
01:16:44 18 X-ray with bullets in her foot?

01:16:46 19 MS. DIXON: Objection.

01:16:47 20 THE WITNESS: I could not say that because --

01:16:49 21 MS. DIXON: Facts not in evidence.

01:16:49 22 MR. O'SULLIVAN: Pardon?

01:16:50 23 THE WITNESS: When we were in the court, they
01:16:51 24 did not say, "Bullet fragments." They said, "Metallic
01:16:53 25 fragments."

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01:16:54 1 BY MR. O'SULLIVAN:

01:16:55 2 Q Metallic is not glass; right?

01:16:56 3 A I'm not an expert.

01:16:58 4 Q But you are casting an opinion on whether
01:17:00 5 Megan told the truth based on forensic evidence; right?

01:17:03 6 A Well, bullet fragments went missing, as it was
01:17:06 7 reported; so I could not.

01:17:07 8 Q You sat in the courtroom and saw the doctor
01:17:10 9 who worked on her foot show you the X-ray that had
01:17:13 10 metallic fragments in her foot. Yes?

01:17:17 11 A Uh-huh. Yes. And "TMZ" reported that glass
01:17:19 12 was broken. And she did tell cops she stepped on glass,
01:17:20 13 and a medical report stated that she was treated for
01:17:22 14 glass.

01:17:23 15 Q What does one have to do with the other if
01:17:25 16 there's bullet fragments in her foot?

01:17:27 17 A That a professional should know the difference
01:17:29 18 between glass and bullets. And that the people who
01:17:31 19 responded on scene, outside of her claiming she stepped
01:17:33 20 on glass, and the "TMZ" report saying that there was
01:17:36 21 glass in the vehicle, her wound did not look consistent
01:17:39 22 to me. And I did look it up with gunshot wounds. Yeah.

01:17:44 23 I mean -- and by the time we got to court,
01:17:46 24 there was a medical report put out by another outlet --
01:17:49 25 fed it, I believe -- Myron Gaines, and the medical

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01:17:53 1 report stated that she was treated for glass. So, to
01:17:56 2 me, that was very questionable.

01:17:57 3 Did somebody need to be removed from the
01:18:00 4 hospital? I don't want to go to the hospital, and you
01:18:02 5 can't tell the difference between glass and bullets.

01:18:05 6 Q Uh-huh. All right.

01:18:06 7 Do you have any personal knowledge that she
01:18:11 8 wasn't shot?

01:18:11 9 A No.

01:18:13 10 Q Do you have any evidence -- admissible
01:18:16 11 evidence suggesting she wasn't shot?

01:18:18 12 A No.

01:18:19 13 Q Okay. Did anybody at the trial -- did Tory at
01:18:22 14 the trial say, "I didn't shoot her"?

01:18:25 15 A No.

01:18:25 16 Q Okay. Has Tory ever said to you, "I didn't
01:18:27 17 shoot her"?

01:18:28 18 A No.

01:18:29 19 Q Megan said at the trial that he did. Yeah?

01:18:31 20 A Right.

01:18:32 21 Q Okay.

01:18:32 22 A Tory has publicly stated he didn't do anything
01:18:34 23 wrong. Online.

01:18:37 24 Q It wasn't done under oath; right? Was not
01:18:41 25 willing to say it under oath.

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01:18:42 1 It would have been really good for him to say
01:18:44 2 that under oath; right?

01:18:45 3 A Well, that wasn't my concern.

01:18:47 4 MS. DIXON: Objection. That -- that calls for
01:18:48 5 speculation.

01:18:48 6 BY MR. O'SULLIVAN:

01:18:48 7 Q That wasn't your concern?

01:18:50 8 A No. You were asking me why I didn't believe
01:18:52 9 her; so him not on the stand wasn't my concern.

01:18:54 10 Prior to that, it was Megan lying. When
01:18:56 11 police arrived on the scene, she wasn't honest. And
01:18:58 12 that, to me, that was a hit on her credibility.

01:19:02 13 She went on Instagram Live multiple times
01:19:05 14 contradicting herself. It is a fact that she was not in
01:19:07 15 her original seat; so the weapon that was there she
01:19:10 16 moved.

01:19:11 17 Q And all that was presented to a jury of her
01:19:14 18 peers and the way we do it in America, and he was
01:19:15 19 convicted of having shot her; right?

01:19:17 20 MS. DIXON: Objection. Argumentative.

01:19:17 21 BY MR. O'SULLIVAN:

01:19:18 22 Q That's what happened right before your eyes in
01:19:19 23 the courtroom.

01:19:21 24 MS. DIXON: Objection. Argumentative.

01:19:21 25 THE WITNESS: It was. But thank God for the

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01:19:22 1 appeals court.

01:19:23 2 BY MR. O'SULLIVAN:

01:19:24 3 Q They haven't done anything with that
01:19:25 4 conviction?

01:19:25 5 A Not yet. But thank God for it. That's why
01:19:25 6 they appeal.

01:19:27 7 Q And you are going to be saying the same stuff
01:19:29 8 even if the appeal is dismissed or the conviction is
01:19:31 9 affirmed?

01:19:31 10 A I can't speak to the future, but right now, I
01:19:33 11 don't believe a case was proven. I heard prosecutors
01:19:36 12 say, "DNA was a wash." I don't believe that DNA is
01:19:39 13 essential.

01:19:39 14 Q What do you mean you don't believe that the
01:19:41 15 case was proven? They put on a case, and the jury
01:19:44 16 convicted.

01:19:45 17 What is the definition of "proven," if it's
01:19:46 18 not that?

01:19:47 19 A Well, for me, I believe that the court of
01:19:49 20 appeals -- it exists for the reason that if something
01:19:52 21 didn't go the way you believe, you have a chance to
01:19:54 22 argue it. And many people have been found innocent
01:19:56 23 after being convicted.

01:19:59 24 Q Uh-huh.

01:19:59 25 A Especially Black men.

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01:20:00 1 Q Uh-huh. Uh-huh. Okay.

01:20:07 2 "Cardi won her case because Tasha K. handed it

01:20:13 3 to her."

01:20:14 4 A Uh-huh.

01:20:15 5 Q What does that mean?

01:20:16 6 A There were assertions that this blogger Tasha

01:20:18 7 K. made that I felt like sealed the deal for her and her

01:20:22 8 case.

01:20:22 9 Q What do you mean?

01:20:23 10 A She lost her defamation case with Cardi B.

01:20:26 11 Q You mean Cardi B. successfully sued Tasha K.

01:20:30 12 for defaming her?

01:20:32 13 A Yes.

01:20:32 14 Q Okay. And you are being sued here today for

01:20:34 15 defaming Megan; right?

01:20:37 16 A I'm accused of defaming Megan, yes.

01:20:39 17 Q Yes. And you are saying that you think your

01:20:42 18 situation is going to come out differently because

01:20:44 19 Tasha K. handed it to her?

01:20:46 20 A What I'm saying is me and Tasha K. are two

01:20:49 21 different people, and the things that were said there

01:20:50 22 are not similar to what I stated.

01:20:52 23 Q Well, you stated that "Megan lied under oath

01:20:56 24 in a criminal trial"; right? That's defamatory.

01:20:59 25 A I posed a question.

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01:21:00 1 Q Okay. And in what way did Tasha K. hand
01:21:04 2 Cardi B. this case?

01:21:05 3 A In my opinion, the assertions that she made
01:21:08 4 without proof of it is why she lost her case.

01:21:10 5 Q What did she say without proof?

01:21:12 6 A She accused Cardi of having an STD.

01:21:15 7 Q And she didn't have proof of that?

01:21:17 8 A Tasha K. did not.

01:21:18 9 Q Okay. You don't have proof of anything, do
01:21:19 10 you?

01:21:20 11 A No, not in this.

01:21:22 12 MS. DIXON: Objection. Argumentative.

01:21:23 13 BY MR. O'SULLIVAN:

01:21:23 14 Q Anything you've said, you don't have actual
01:21:25 15 admissible proof of it; right? You are speculating
01:21:27 16 based on stuff you read or somebody told you. Yeah?

01:21:29 17 A Yes.

01:21:30 18 Q Okay.

01:21:45 19 THE VIDEOGRAPHER: Counsel, can we take the
01:21:46 20 paper off of the mic? Thank you.

01:21:54 21 MR. O'SULLIVAN: All right. I'm going to mark
01:21:55 22 as Exhibit 41 --

01:22:10 23 THE WITNESS: Pass it down.

01:22:11 24 MR. O'SULLIVAN: I'm handing to Counsel
01:22:11 25 Exhibit 41.

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01:22:13 1 MS. DIXON: What was the previous one? I'm
01:22:14 2 sorry.
01:22:14 3 MR. O'SULLIVAN: 40.
01:22:15 4 MS. HAYRAPETIAN: 40.
01:22:16 5 MS. DIXON: Okay.
01:22:25 6 MR. O'SULLIVAN: Does this one have video?
01:22:26 7 MS. HAYRAPETIAN: No video.
01:22:27 8 MR. O'SULLIVAN: Another same thing. Okay.
01:22:27 9 For the record, I've marked as Exhibit 41, a
01:22:30 10 one-page document. It's got Bates number P2165.
01:22:35 11 Appears to be IG Milagro Gramz, 4:09 PM, March 12th,
01:22:42 12 2022, Twitter for iPhone.
01:22:44 13 (Exhibit 41 was marked for identification.)
01:22:44 14 BY MR. O'SULLIVAN:
01:22:44 15 Q And I'll ask you, Ms. Cooper, is this
01:22:51 16 something you posted on the date indicated on 41?
01:22:54 17 A I believe so.
01:22:55 18 Q Okay. Tell me everything about this. What --
01:22:58 19 why did you do this?
01:23:00 20 A I had a question; so I posted on Twitter.
01:23:04 21 Q All right. What is -- what is even -- what do
01:23:07 22 you have a question about? What's going on here?
01:23:09 23 The first picture on the left, it says
01:23:10 24 "Mob Radio," and it looks like -- what is that? A meat
01:23:14 25 cutter?

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01:23:19 1 A That looks like a still shot from a music
01:23:21 2 video. I don't know if I see a meat cutter, but I see
01:23:24 3 what looks like a leg and a body and arms.
01:23:27 4 Q Somebody's cutting up a body part; yeah? Is
01:23:29 5 that a horse's --
01:23:30 6 A Someone appears to be in a butcher shop.
01:23:32 7 Q Okay. And did you -- you were the one that
01:23:34 8 picked this image?
01:23:35 9 A I couldn't say.
01:23:37 10 Q Well, you posted it.
01:23:38 11 Would you post something that wasn't selected
01:23:40 12 by you?
01:23:43 13 A What -- you -- wait, go back to your original
01:23:45 14 question. You asked, like, did I -- you said did I take
01:23:48 15 that screenshot?
01:23:49 16 Q Did you -- did you choose the image to
01:23:54 17 include?
01:23:55 18 A For this post? Yes.
01:23:57 19 Q All right. I'm going to be careful again.
01:23:58 20 We're starting to talk over each other. All right.
01:24:00 21 MS. DIXON: Hold on one second. We need a
01:24:02 22 break for a sec.
01:24:03 23 MS. HAYRAPETIAN: Can we go off the record for
01:24:04 24 a second?
01:24:06 25 THE VIDEOGRAPHER: Does everybody agree?

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01:24:09 1 MS. DIXON: Yes.

01:24:09 2 MS. HAYRAPETIAN: I'm sorry.

01:24:09 3 THE VIDEOGRAPHER: Counsel, wait, hold on.

01:24:09 4 Do you want me to read us off?

01:24:09 5 MR. O'SULLIVAN: Why are we doing this?

01:24:09 6 MS. HAYRAPETIAN: Are you okay?

01:24:09 7 MS. DIXON: Since you agree, I have a

01:24:11 8 question. I just got an email --

01:24:11 9 THE COURT REPORTER: Wait, we're not off the

01:24:11 10 record.

01:24:14 11 THE VIDEOGRAPHER: We're not off the record.

01:24:14 12 MS. DIXON: Okay.

01:24:14 13 THE VIDEOGRAPHER: Counsel, do you agree to go

01:24:18 14 off the record?

01:24:19 15 MR. O'SULLIVAN: No.

01:24:19 16 Why are we doing that?

01:24:21 17 MS. DIXON: 'Cause you took the drive that I

01:24:22 18 want and --

01:24:23 19 MR. O'SULLIVAN: This business about your

01:24:23 20 other case and the drive. I'm trying to do a deposition

01:24:25 21 here.

01:24:26 22 MS. DIXON: It's not a case. It's this case.

01:24:28 23 It's some evidence in this case. I asked you to copy

01:24:30 24 it, and you said that's what they were going to do. And

01:24:32 25 now Dan tells me you took it. That's the only copy I

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01:24:35 1 have.

01:24:35 2 MR. O'SULLIVAN: Take it outside.

01:24:36 3 MS. DIXON: You represented that you were

01:24:37 4 going to copy it through your people, and you were going

01:24:39 5 to give me another --

01:24:40 6 MR. O'SULLIVAN: Okay. I'm in the middle of

01:24:41 7 questioning the witness. Please.

01:24:43 8 MS. DIXON: I wouldn't have given it to you if

01:24:44 9 I'd of known you were going to take it. I told you

01:24:46 10 clearly that it wasn't your copy.

01:24:49 11 MS. HAYRAPETIAN: They are copying it. They

01:24:51 12 can't do it all in one sitting.

01:24:52 13 MR. O'SULLIVAN: Please.

01:24:55 14 BY MR. O'SULLIVAN:

01:24:56 15 Q We're on Exhibit 41.

01:24:57 16 Number one, did you create this post?

01:25:03 17 A I believe so.

01:25:04 18 Q Okay. On or about the time it's dated,

01:25:06 19 March 12th, 2022?

01:25:08 20 A I believe so.

01:25:11 21 Q Okay. And did you, prior to posting this,

01:25:13 22 talk about -- talk with anybody about what you were

01:25:15 23 going to put up here?

01:25:16 24 A No.

01:25:18 25 Q Did you tell anybody in advance you were going

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01:25:19 1 to post something about horses and legs?

01:25:23 2 A No.

01:25:23 3 Q Okay. Did you create this Exhibit 41, the

01:25:30 4 post, all by yourself?

01:25:32 5 A Yes.

01:25:33 6 Q Nobody helped you?

01:25:34 7 A No.

01:25:35 8 Q Did you talk to a lawyer before you did this?

01:25:36 9 A No.

01:25:37 10 Q Were you worried you could get in legal

01:25:38 11 trouble for doing this?

01:25:39 12 A No.

01:25:40 13 Q Okay. Have you been worried at any time,

01:25:42 14 during your posting about Megan, that you faced legal

01:25:46 15 problems for doing what you are doing?

01:25:48 16 A No.

01:25:48 17 Q All right. "Daystar, is that a horse's leg,"

01:25:58 18 two different emojis.

01:25:59 19 What were you trying to communicate there?

01:26:01 20 A When this music video was released, people

01:26:04 21 thought that it was a horse's leg in the music video.

01:26:06 22 They thought maybe he had been taunting Megan. So I put

01:26:10 23 it online to see what the response from the public would

01:26:14 24 be. What did they think about it, basically.

01:26:22 25 Q Tell me what -- what -- what -- what online

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01:26:25 1 reactions you were -- you were addressing here? What
01:26:28 2 were people saying that you were responding to?

01:26:30 3 A People were accusing Tory of taunting Megan by
01:26:34 4 putting what they thought was a horse's leg in the
01:26:36 5 video -- in a music video he released.

01:26:39 6 Q Okay. And people are saying that online?

01:26:41 7 A Uh-huh.

01:26:42 8 Q And then you went and found a picture of a
01:26:46 9 horse's leg and asked him if it's a horse's leg?

01:26:51 10 A Not necessarily asked him.

01:26:53 11 Q You can have questions that can have a motive,
01:26:56 12 right, if you are trying to put people somewhere?

01:26:58 13 A So, on social media and when it comes to me,
01:27:00 14 posting something like this, there's not an expectation
01:27:02 15 that Daystar, or any other person, would necessarily
01:27:05 16 answer. It's just once, again, highlighting a trending
01:27:08 17 topic, and then you see the responses from the public.

01:27:10 18 The public thought it was a horse's leg; so I
01:27:12 19 post and say, "Daystar, is that a horse's leg," and then
01:27:16 20 you get -- you see what the public says, based on that.
01:27:17 21 Okay. Then you move forward.

01:27:20 22 Q Uh-huh. Uh-huh. And did you get responses to
01:27:24 23 this?

01:27:26 24 A I could not say.

01:27:28 25 Q Exhibit 41?

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01:27:29 1 A I couldn't say. I see the stats on it, but I
01:27:31 2 couldn't say in terms of responses to it.
01:27:33 3 Q Did Daystar answer your question?
01:27:35 4 A No.
01:27:36 5 Q Sitting here today, do you know whether he
01:27:38 6 intended to mock or troll her by putting a horse's leg
01:27:41 7 in his video?
01:27:42 8 A I do not know. I don't even know if that is a
01:27:44 9 horse's leg.
01:27:45 10 Q Okay. One way or the other?
01:27:46 11 A I don't know, no.
01:27:47 12 Q You are just throwing out questions?
01:27:48 13 A Right. I was curious.
01:27:50 14 Q Okay. Uh-huh.
01:27:56 15 MS. HAYRAPETIAN: Can we pull up --
01:27:59 16 MR. O'SULLIVAN: Are we at 42?
01:28:01 17 MS. HAYRAPETIAN: -- 23-A the video clip?
01:28:05 18 MR. O'SULLIVAN: This is going to be 42. No.
01:28:05 19 Is it 42?
01:28:12 20 MS. HAYRAPETIAN: 42-B. And the clip will be
01:28:13 21 42-A.
01:28:15 22 THE VIDEOGRAPHER: I'm not pulling it up.
01:28:15 23 MS. HAYRAPETIAN: Oh.
01:28:15 24 Ms. Autumn Taylor, would you please pull up
01:28:23 25 42-A?

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01:28:28 1 STENO TECH ASSISTANT: What number? I
01:28:29 2 couldn't quite hear you.
01:28:31 3 MS. HAYRAPETIAN: 23-A.
01:28:59 4 STENO TECH ASSISTANT: 23-A. Yes. One
01:28:59 5 moment, please.
01:28:59 6 (Off-the-record discussion between the Court Reporter
01:28:59 7 and Counsel.)
01:28:59 8 MR. O'SULLIVAN: The video we're going to
01:28:59 9 watch is 42-A.
01:28:59 10 STENO TECH ASSISTANT: Let me know if you want
01:29:00 11 me to play it.
01:29:01 12 MR. O'SULLIVAN: Let's just wait until
01:29:01 13 everybody has everything in front of them.
01:29:02 14 Ronda, do you have a copy of the transcript?
01:29:06 15 MS. DIXON: Yes, sir.
01:29:06 16 MR. O'SULLIVAN: Yes. For the record, we've
01:29:09 17 marked as 42-A and B a recording of an online -- some
01:29:18 18 words from the defendant, and then we also have a -- a
01:29:21 19 court reporter transcript to go along.
01:29:24 20 So, yes, if you would please play the clip.
01:29:32 21 (A video clip was played.)
01:29:32 22 (Exhibit 42-A was marked for identification.)
01:29:32 23 (Exhibit 42-B was marked for identification.)
01:29:32 24
01:30:06 25 BY MR. O'SULLIVAN:

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01:30:07 1 Q All right. So we just listened to the audio
01:30:09 2 and saw the video.

01:30:10 3 Ms. Cooper, is 42-A, which we just watched,
01:30:13 4 you talking on one of your platforms?

01:30:16 5 A Yes.

01:30:17 6 Q And the transcript, 42-B, you had a chance to
01:30:19 7 look at that.

01:30:20 8 Does that accurately capture what you said?

01:30:22 9 A Yes.

01:30:23 10 Q Okay. We were just talking about you calling
01:30:29 11 Megan a liar.

01:30:30 12 A Uh-huh.

01:30:31 13 Q You say in here, "Because I always said her
01:30:35 14 ass was lying, bitch"; right.

01:30:36 15 A Uh-huh.

01:30:37 16 Q That's pretty clear. Yeah? You accused her
01:30:39 17 of lying.

01:30:40 18 A But about what.

01:30:41 19 Q In general?

01:30:42 20 A Once again, she's lied about many things;
01:30:43 21 so --

01:30:44 22 Q But I think what you said before was "I didn't
01:30:48 23 call her a liar. I just asked questions"; right?

01:30:51 24 That's what you said.

01:30:52 25 A No. You said that I had said that she

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01:30:54 1 perjured herself. And I said, "no. I did not say that.
01:30:57 2 I asked a question." But I told you that she's lied
01:30:59 3 many times; so I have called her a liar.

01:31:01 4 Q Do you deny saying right here, in this
01:31:04 5 publicly posted --

01:31:05 6 MS. DIXON: Objection. Argumentative.

01:31:07 7 MR. O'SULLIVAN: I'm in the middle of the
01:31:08 8 question, Counsel.

01:31:09 9 MS. DIXON: Okay.

01:31:10 10 BY MR. O'SULLIVAN:

01:31:11 11 Q I asked you if you had called Megan a liar?

01:31:17 12 A Uh-huh.

01:31:18 13 Q And then I've showed you something where you
01:31:19 14 say, "Because I always said her ass was lying"?

01:31:22 15 A Uh-huh.

01:31:23 16 Q And do you not think that's calling her a
01:31:26 17 liar?

01:31:26 18 A I think that it's important to acknowledge
01:31:30 19 what I'm saying she's lying about.

01:31:31 20 Q Why?

01:31:32 21 A Because you can't put it all in one box.
01:31:35 22 She's has lied about many things.

01:31:37 23 Q But the listener doesn't know what you are
01:31:39 24 talking about?

01:31:39 25 A Yes, they do.

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01:31:40 1 Q How could they? You say she is a liar; right?

01:31:42 2 A The listeners are the ones that have been

01:31:43 3 keeping up with everything. So if they're following,

01:31:45 4 then they would know that.

01:31:46 5 And Megan herself has asserted that she lied

01:31:48 6 to Gayle King; so she's -- she's the liar per her own

01:31:51 7 admission.

01:31:52 8 Q Uh-huh. Uh-huh.

01:31:52 9 It says, further down, "The fuck. A bitch

01:31:59 10 fuck with my nigga. I'm going to slap that hoe, and

01:32:02 11 whatever comes after it, comes after it."

01:32:04 12 What does that mean?

01:32:06 13 A That means that hypothetical speaking that if

01:32:09 14 I became aware of infidelity, that I wouldn't get upset.

01:32:16 15 Q That's what you get from this sentence?

01:32:18 16 A Absolutely. 'Cause that's what I meant.

01:32:21 17 Me and Megan have never shared a man; so I

01:32:24 18 wouldn't be speaking of her.

01:32:26 19 Q I still don't understand what you are saying.

01:32:32 20 A Hypothetically speaking, a "bitch" is any

01:32:34 21 human. If a bitch messes with my man, has sex with my

01:32:37 22 man, then I would be upset.

01:32:42 23 Q And is -- are you saying this is the

01:32:46 24 explanation for the Megan shooting?

01:32:50 25 A No. This statement here is me literally

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01:32:53 1 saying that --

01:32:54 2 Q Who is -- who is the bitch? Who is the N-word
01:32:56 3 in this?

01:32:57 4 A This is -- what -- my statement is
01:32:59 5 hypothetical. In relation to the case, Megan was
01:33:02 6 accused of sleeping with Tory behind Kelsey's back. So
01:33:06 7 I said --

01:33:06 8 Q So it is a reference to that?

01:33:08 9 A You can't make it that I'm speaking of her is
01:33:10 10 my point, because I hypothetically stated.

01:33:13 11 Q Doesn't say "hypothetically" in here. It's
01:33:15 12 a --

01:33:15 13 A It doesn't have to.

01:33:16 14 Q -- it's a text about Megan.

01:33:18 15 A Right. But you are asking me about what I
01:33:20 16 meant, and that's what I meant.

01:33:21 17 Q Okay. And you understand that it's possible
01:33:23 18 someone who read this would take it as a direct
01:33:24 19 statement about Megan; right?

01:33:26 20 A I do not understand that, because we come from
01:33:28 21 different places. And you are misinterpreting what I
01:33:31 22 meant; so --

01:33:32 23 Q Okay. So your testimony under oath right now
01:33:34 24 is you weren't referring to Megan when you said this
01:33:36 25 sentence?

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01:33:37 1 A No. I was speaking hypothetically.

01:33:40 2 Q Could be anybody?

01:33:41 3 A Right. If any woman messes with my man, then

01:33:44 4 I'm going to do such and such and da, da. It was

01:33:46 5 hypothetical.

01:33:46 6 Q Yes. And you happened to bring that up as the

01:33:48 7 last sentence of five sentences you spoke all about

01:33:50 8 Megan; right?

01:33:53 9 A Yeah. It's a hypothetical statement based on

01:33:55 10 things --

01:33:56 11 Q How would the reader know?

01:33:58 12 A Who would have been reading it? It was a

01:34:00 13 Live.

01:34:00 14 Q How would the listener know?

01:34:02 15 A Because they've been keeping up with my

01:34:04 16 coverage.

01:34:04 17 Q All of them?

01:34:05 18 A I cannot account for every single person, but

01:34:07 19 the same people, very much so, showed up and supported.

01:34:09 20 Yes.

01:34:11 21 Q Okay. You stand behind everything you said

01:34:15 22 here in Exhibit 42-B?

01:34:17 23 A What do you mean by that -- "stand behind it"?

01:34:19 24 Q You said it. You take it back? Any of it?

01:34:23 25 A Once again, take back what? There's a lot of

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01:34:25 1 things said here.

01:34:25 2 Q Yeah. Any of it, you take back?

01:34:32 3 A Not in this moment. I would need more time to
01:34:34 4 think over that.

01:34:35 5 Q Okay.

01:34:54 6 MR. O'SULLIVAN: All right. I'm going to mark
01:34:55 7 as 43, a copy of the operative complaint. And then I'm
01:35:14 8 going to do them together.

01:35:15 9 And also the answer is going to be 44.

01:35:26 10 MS. DIXON: Which one is this?

01:35:27 11 MR. O'SULLIVAN: The answer and complaint. 43
01:35:28 12 is the complaint, and 44 is the answer.

01:35:31 13 MS. DIXON: Okay.

01:35:31 14 MR. O'SULLIVAN: A serial offender. All
01:35:48 15 right.

01:35:50 16 THE VIDEOGRAPHER: Actually, a little bit
01:35:50 17 down. It will scrape against your tie.

01:36:03 18 MR. O'SULLIVAN: All right. For the record,
01:36:03 19 I've marked as Exhibit 43 a copy of the operative
01:36:06 20 complaint in this case. It's a 39-page document.

01:36:14 21 And then I've also marked as Exhibit 44 a copy
01:36:17 22 of the operative answer of affirmative defenses in the
01:36:20 23 case.

01:36:20 24 (Exhibit 43 was marked for identification.)

01:36:20 25 (Exhibit 44 was marked for identification.)

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01:36:27 1 BY MR. O'SULLIVAN:

01:36:27 2 Q First of all, Ms. Cooper, I have a couple
01:36:29 3 questions about specific parts of this complaint that
01:36:32 4 started the case and your answer; but if you want to be
01:36:35 5 comfortable, you look at as much of it as you want. I'm
01:36:38 6 not just trying show a part. So I'll show you what I
01:36:40 7 care about, and then you decide what you want to read.

01:36:42 8 But I'm just going to focus on page 8.

01:37:02 9 Okay. In -- in paragraph 27, why don't you go
01:37:09 10 ahead and read that to yourself.

01:37:11 11 A Okay.

01:37:11 12 Q And tell me when you are done.

01:37:17 13 A I'm done.

01:37:18 14 Q Okay. And now look -- if you turn the answer
01:37:20 15 to page 3, I'm going to try to get the matching -- so
01:37:24 16 whatever 27 is there.

01:37:26 17 You see your response in paragraph 27?

01:37:29 18 A Okay.

01:37:32 19 Q I apologize. I should have done this first.

01:37:34 20 Am I right that 44 is a copy of the answer
01:37:38 21 that your counsel filed for you in this case?

01:37:40 22 A Yes.

01:37:40 23 Q Okay. So, on 27, you read what it says there,
01:37:44 24 and then your answer says, that you admit to operating
01:37:47 25 numerous social media accounts one time or another and

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01:37:52 1 has submitted to oral discretion.

01:37:56 2 And then, in the end, you say, "Defendant also
01:37:58 3 denies that she is the sole speaker, writer, and/or
01:38:01 4 editor of every post on her social media accounts."

01:38:04 5 Can you tell me what -- what that refers to?

01:38:07 6 A To Mike who -- the internship situation.

01:38:09 7 Q Okay. And so he -- was he like -- how would
01:38:12 8 you describe what that is? Someone is helping you get
01:38:15 9 your tweets out or your Post-its?

01:38:17 10 A No. He would -- someone who would determine
01:38:18 11 what was trending and -- and post worthy and post and
01:38:22 12 write a caption.

01:38:23 13 Q Uh-huh. Okay. Was involved in posting any
01:38:28 14 tweets that have been alleged to be defamatory of Megan?

01:38:34 15 A Not that I know of.

01:38:34 16 Q Okay. You are not saying here that he is --
01:38:37 17 he is responsible for something that's in the case?

01:38:39 18 A No.

01:38:40 19 Q Okay. All right. Now, let's turn to page 12
01:38:50 20 of the complaint. And -- I'm focused on paragraph 42.
01:39:05 21 It might be easier if I read this one. This is under
01:39:09 22 the heading that says, "Defendant Promoted The Deepfake
01:39:12 23 Video."

01:39:12 24 [As read] In June 2023, defendant registered
01:39:16 25 for an X account using the screen name MobzWorld. In

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01:39:19 1 registering for an X account, defendant created a
01:39:21 2 profile on X, including, among other things, a, quote,
01:39:23 3 "likes" page on her X profile.

01:39:26 4 Likes are a feature of X whereby a user can
01:39:28 5 show their support for a post by clicking the Like
01:39:31 6 button, which is portrayed as a heart symbol under each
01:39:35 7 individual X post. Likes are then recorded for each
01:39:39 8 post and publicized as a statistic that is visible on
01:39:42 9 each post with more popular posts featuring a higher
01:39:45 10 number of likes, and less popular posts showing few to
01:39:49 11 no likes.

01:39:50 12 As with any X user, defendant's likes page on
01:39:53 13 her X profile tracked and displayed the post that
01:39:56 14 defendant liked, i.e., posts which defendant pressed the
01:39:59 15 Like icon from her X account. Defendant's likes page
01:40:03 16 was featured as a tab on defendant's X profile and
01:40:06 17 accessible to all third-party X users.

01:40:09 18 And then there's a footnote that you later
01:40:15 19 made your likes inaccessible?

01:40:17 20 A X made them inaccessible.

01:40:19 21 Q I'm sorry. Yes, across the board.

01:40:20 22 Okay. And then, on your response to that, in
01:40:23 23 Number 42, you say you admit that you used that screen
01:40:26 24 name.

01:40:26 25 A Uh-huh.

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01:40:27 1 Q But you deny everything else.

01:40:28 2 And so what is it in all these things about
01:40:31 3 how -- how the likes work that you are denying? Do you
01:40:35 4 disagree were that?

01:40:35 5 A I disagree because the way that users use
01:40:38 6 Twitter and the way they may have intended for users to
01:40:42 7 use are it two different things. So I don't necessarily
01:40:44 8 use it to promote or to show that I like something or --
01:40:48 9 that doesn't mean I agree? It doesn't necessarily mean
01:40:51 10 that.

01:40:51 11 Q So you -- when you say "I like it," you don't
01:40:54 12 mean you like it?

01:40:55 13 A Not in every instance, no.

01:40:57 14 Q Do you mean, by expressing your like, to draw
01:41:02 15 attention to people who pay attention to you?

01:41:05 16 A No. Because a "like page" is something that
01:41:07 17 people could look at, but it's for you. It's your
01:41:09 18 likes. So while people could see it, it's for you to go
01:41:12 19 back and reference, not necessarily the people.

01:41:15 20 Q Well, let's cut right to it. The Deepfake
01:41:18 21 video -- did you attempt to direct attention to that
01:41:21 22 video by liking it and telling people to go check out
01:41:24 23 your likes?

01:41:25 24 A No. I was reporting on a situation I was made
01:41:27 25 aware of, and I simply wanted them to know what I was

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01:41:32 1 talking about.

01:41:33 2 Q Did you intend, by doing what you did, liking
01:41:36 3 it and then telling people to go look at your likes, for
01:41:39 4 more people -- your followers to see the video?

01:41:43 5 A No. I want them to see the post on Twitter.

01:41:47 6 Q Of the video?

01:41:49 7 A No. The video was not on Twitter.

01:41:51 8 Q What post did you want them to see?
01:41:53 9 Screenshot of the video?

01:41:54 10 A I wanted them to see the post that they were
01:41:56 11 bringing to my attention; so I liked it so that they
01:41:58 12 could go read it, and what they did after that was their
01:42:02 13 business.

01:42:02 14 Q Okay. But part of this is they go look at
01:42:04 15 what you liked; right?

01:42:07 16 A They could go to my likes, yes.

01:42:09 17 Q That was the intended result; right?

01:42:12 18 A Once again, when I'm reporting on things as a
01:42:15 19 reference, I need to see. Sometimes they want to know
01:42:17 20 what are you even talking about; so it was just to say
01:42:20 21 this is what I'm talking about.

01:42:21 22 Q Sure. How is that not drawing attention to
01:42:23 23 the thing you are reporting about?

01:42:25 24 A Because they would have to follow up. It's a
01:42:28 25 headline.

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01:42:29 1 Q They would have to follow up in the place you
01:42:31 2 sent them?

01:42:32 3 A I didn't send them there. If I'm taking them
01:42:35 4 to Twitter, we're on Twitter. Per my knowledge the
01:42:37 5 video was Bimbella.com. I did not direct anybody to
01:42:41 6 Bimbella.com.

01:42:43 7 Q What's it called?

01:42:44 8 A Bimbella.

01:42:44 9 Q How do you spell that?

01:42:45 10 A I believe B-I-M-B-E-L-L-A.

01:42:49 11 Q Is that a platform that you use yourself?

01:42:57 12 A No.

01:42:57 13 Q Do you know what it is?

01:42:58 14 A No.

01:42:59 15 Q How did you know it was on Bimbella?

01:43:01 16 A The post -- when a Twitter -- on Twitter when
01:43:05 17 you post a video, it puts where it came from at the
01:43:07 18 bottom; so it said Bimbella.com right under it.

01:43:11 19 Q Under what?

01:43:12 20 A Under the video.

01:43:13 21 Q I thought the video wasn't on Twitter?

01:43:15 22 A Or under the post of the -- whatever the post
01:43:18 23 was -- it was a still shot, and under it said,
01:43:21 24 "Bimbella.com."

01:43:23 25 Q Okay. At any time before you liked the

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01:43:27 1 video --

01:43:29 2 A No. Liked the post.

01:43:29 3 Q -- liked the post --

01:43:31 4 A Uh-huh.

01:43:32 5 Q -- did you watch the video?

01:43:37 6 A I don't believe so.

01:43:37 7 Q Have you ever watched the video?

01:43:39 8 A Yes.

01:43:39 9 Q When?

01:43:40 10 A That day -- June 8th.

01:43:42 11 Q Okay. And on what platform did you watch it?

01:43:45 12 A I didn't watch it on a platform. I saw it on

01:43:47 13 my phone.

01:43:49 14 Q Was it on Twitter? Did you click on Twitter

01:43:52 15 to watch the video on June 8th?

01:43:54 16 A Actually, somebody sent me a DM on Instagram

01:43:57 17 with a completely different link. I clicked that. I

01:43:59 18 didn't click the actual -- the Bimbella thing because

01:44:02 19 someone said they got a virus on their phone.

01:44:09 20 Q Did you produce that?

01:44:10 21 A No.

01:44:11 22 Q That message that someone sent you to go look

01:44:13 23 at the video?

01:44:14 24 A Yes.

01:44:14 25 Q Okay. We'll look at that.

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01:44:16 1 All right. So the -- your understanding is
01:44:19 2 the video existed where on June 8th? Where did you
01:44:23 3 see it? I mean, I know you were led there by somebody.
01:44:25 4 Where did you see it?

01:44:27 5 A I saw it on the -- I don't know the name of
01:44:28 6 the website, but the link per my Instagram DM. That's
01:44:32 7 where I watched it at.

01:44:34 8 Q But you liked the Twitter post?

01:44:41 9 A Yes.

01:44:43 10 Q Why didn't you like the place where you saw
01:44:44 11 it?

01:44:45 12 A There was nothing to like. It was a private
01:44:47 13 Instagram message.

01:44:49 14 Q Okay. And did you expect that the people you
01:44:52 15 told to like -- to check out your likes on Twitter would
01:44:55 16 find their way to the video?

01:44:57 17 A Not necessarily because I was on STATIONHEAD
01:45:01 18 at the time; so I wasn't full-fledged streaming. I was
01:45:04 19 actually that day going back and forth with Cardi B. and
01:45:08 20 her sister Hennessey publicly. We were in a public
01:45:11 21 spat. And I was streaming on STATIONHEAD talking about
01:45:13 22 that, actually, when I was distracted by people coming
01:45:16 23 in saying, "Hey, hey, hey, this just happened."

01:45:19 24 Q But you sent people to a specific place on
01:45:21 25 Twitter; right? My likes?

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01:45:24 1 A Well, when I tweet "Go to my likes," your
01:45:26 2 likes page is going to have all your likes. So no one
01:45:28 3 on Twitter would have known what I was talking about.
01:45:30 4 The people on STATIONHEAD that were active in that
01:45:32 5 conversation, those are the ones that would have been
01:45:35 6 aware of the topic we were discussing.

01:45:37 7 Q All right. So I just want to make sure I
01:45:39 8 understand this. You are saying that liking the video
01:45:48 9 or whatever you -- the page -- the post --

01:45:50 10 A Uh-huh. The post.

01:45:50 11 Q -- the Deepfake -- you know that's Deepfake
01:45:53 12 now; right?

01:45:54 13 A I don't know that.

01:45:56 14 Q Do you have any basis to say it's not
01:45:57 15 Deepfake?

01:45:59 16 A Megan says it's not her. But I don't know
01:46:01 17 anything about the video or where it came from.

01:46:03 18 Q The only thing you know about it is Megan says
01:46:05 19 it's not her?

01:46:06 20 A Right. But when I saw it, I thought it was
01:46:08 21 her.

01:46:09 22 Q Okay. But that's not evidence; right?

01:46:13 23 A Of course it's not evidence. But I didn't
01:46:14 24 create the video. I don't know where it came from.

01:46:16 25 Q Okay. And sitting here today, you think it's

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01:46:19 1 her?

01:46:20 2 A I think it's possible it could be her.

01:46:21 3 Q Okay. And you are spreading that message?

01:46:24 4 A No. I haven't talked about it again. I

01:46:26 5 haven't been able to.

01:46:26 6 What do you mean am I "spreading that

01:46:29 7 message"?

01:46:30 8 Q Okay. You are denying that you told people to

01:46:38 9 check out your likes, 'cause that was a way to send

01:46:42 10 traffic to see the deep porn video without being liable.

01:46:46 11 That wasn't your motive? Tell the truth.

01:46:49 12 A No. I simply said, "Go to my likes" and that

01:46:54 13 was it.

01:46:56 14 Q And you knew when you did that, that was going

01:46:58 15 to cause people to go look at the video; right?

01:47:01 16 A Not look at the video.

01:47:02 17 Once again, when you are reporting on

01:47:04 18 different topics, I knew that it would be something to

01:47:08 19 talk to the people about. I knew that they would know

01:47:10 20 what I was talking about then. It wasn't because --

01:47:11 21 Q 'Cause they would look at it.

01:47:13 22 A They would see the post.

01:47:14 23 Q Or the video, if it's there.

01:47:16 24 A It's their choice. It wasn't up to me.

01:47:18 25 Q But they wouldn't have known about it unless

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01:47:19 1 you sent them there?

01:47:20 2 A No. They came to me.

01:47:22 3 Q And you said, "Go here and look at a video of
01:47:24 4 Meg that might be a Deepfake"?

01:47:26 5 A I did not say that.

01:47:27 6 Q You just said, "Look at it."

01:47:28 7 A I said, "Go to my likes," is what I said.

01:47:31 8 Q All right.

01:47:54 9 MR. O'SULLIVAN: You have to give me a bigger
01:47:55 10 leash.

01:47:55 11 Do you know what I'm talking about?

01:48:08 12 MS. HAYRAPETIAN: The video?

01:48:37 13 MR. O'SULLIVAN: You know what, I'll do it in
01:48:39 14 a minute.

01:48:39 15 BY MR. O'SULLIVAN:

01:48:40 16 Q All right. If we look at the complaint,
01:48:41 17 paragraph 43.

01:48:42 18 A Okay.

01:48:43 19 Q On or about June 8, 2024, defendant liked and
01:48:53 20 X posted -- included a Deepfake video.

01:48:54 21 Do you deny that?

01:49:03 22 A Ask me one more time. I'm sorry.

01:49:05 23 Q I'm just trying to understand that -- your
01:49:06 24 answer, just so you have it, is -- is on page 3.

01:49:10 25 A Okay.

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01:49:11 1 Q So it says 43?

01:49:12 2 A Uh-huh.

01:49:13 3 Q And I'm just trying to figure out what you are

01:49:18 4 admitting, and what you are not admitting. Or what you

01:49:20 5 are saying here.

01:49:21 6 A Okay.

01:49:21 7 Q The first sentence of 43 says that you liked

01:49:23 8 an X post that included the Deepfake video?

01:49:26 9 Do you admit that?

01:49:28 10 A No. I liked an X post that had a link to the

01:49:31 11 video.

01:49:32 12 Q Okay. And then you say by liking -- or no --

01:49:36 13 [As read] We say by liking this X post, the post was

01:49:39 14 archived to and displayed on defendant's likes page, and

01:49:43 15 the video in that post could be viewed from her likes

01:49:45 16 page by visitors; true?

01:49:46 17 A No. They would have to leave Twitter and go

01:49:49 18 to Bimbella.com to watch that video, per what I

01:49:51 19 remember. I believe it would have taken you off their

01:49:54 20 site.

01:49:56 21 Q To the video?

01:49:57 22 A I believe so, yes.

01:49:58 23 Q So, if they would have -- if you would have --

01:50:00 24 you liked what you liked. You said, "Check out my

01:50:02 25 likes." They went to your likes. If they clicked

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01:50:04 1 enough times there, they would get the video; right?

01:50:07 2 A If they clicked it, I believe it would take

01:50:09 3 them to another site.

01:50:10 4 Q That would show them the video?

01:50:12 5 A Yeah, I think so.

01:50:13 6 Q Okay. All right.

01:50:30 7 MR. O'SULLIVAN: I think that's it for these

01:50:32 8 two. We can do whatever you had next in order.

01:50:45 9 MS. HAYRAPETIAN: Can you play 25-A, please?

01:50:50 10 STENO TECH ASSISTANT: Yes. One moment.

01:50:51 11 Let me know whenever you would like for me to

01:51:17 12 play it.

01:51:22 13 MS. HAYRAPETIAN: And then can we mark this as

01:51:23 14 the next exhibit?

01:51:29 15 MR. O'SULLIVAN: So this is 45. Is there an A

01:51:29 16 and B or?

01:51:30 17 MS. HAYRAPETIAN: A is the audio that is about

01:51:32 18 to play.

01:51:32 19 MR. O'SULLIVAN: All right. And so this is

01:51:33 20 45-B.

01:51:38 21 STENO TECH ASSISTANT: All right. Playing the

01:51:39 22 audio.

01:51:40 23 MR. O'SULLIVAN: Not yet. Let her mark it.

01:51:41 24 Sorry. If you can just read it while she's

01:51:41 25 waiting.

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01:51:41 1 MS. DIXON: Which number?

01:51:41 2 MR. O'SULLIVAN: I gave you one here.

01:51:59 3 MS. DIXON: This one is?

01:52:01 4 MR. O'SULLIVAN: 45-B.

01:52:02 5 MS. DIXON: Thank you.

01:52:02 6 Good to go?

01:52:08 7 THE COURT REPORTER: Yes.

01:52:08 8 MR. O'SULLIVAN: Okay.

01:52:15 9 STENO TECH ASSISTANT: Would you like for me

01:52:16 10 to play it?

01:52:18 11 MR. O'SULLIVAN: Yes, please.

01:52:19 12 STENO TECH ASSISTANT: All right.

01:52:21 13 (A video clip was played.)

01:52:35 14 (Exhibit 45-A was marked for identification.)

01:52:35 15 (Exhibit 45-B was marked for identification.)

01:52:37 16 BY MR. O'SULLIVAN:

01:52:37 17 Q Okay. "We know you a lying ass hoe," you said

01:52:43 18 that right?

01:52:43 19 A Uh-huh.

01:52:44 20 Q Okay. And are you saying that Megan lied

01:52:54 21 under oath?

01:52:57 22 A I've posed that question.

01:52:58 23 Q Have you ever made that accusation?

01:53:00 24 A I don't believe so.

01:53:02 25 Q Okay. Are you in a position to say she lied

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01:53:05 1 under oath?

01:53:06 2 A No.

01:53:07 3 Q Do you retract that, if you said it?

01:53:10 4 A That she lied -- I didn't say it. I don't

01:53:12 5 recall saying that.

01:53:13 6 Q If you said it, you didn't have a basis to say

01:53:15 7 it; right?

01:53:16 8 MS. DIXON: Calls for speculation.

01:53:17 9 Objection. Calls for speculation.

01:53:18 10 BY MR. O'SULLIVAN:

01:53:18 11 Q I'm asking -- with respect, I'm asking if she

01:53:21 12 knows something at the level of confidence that she

01:53:23 13 would accuse Megan of lying under oath, then tell me.

01:53:28 14 A Are you --

01:53:29 15 Q Do you know that to be true?

01:53:30 16 A Do I know that she would lie under oath?

01:53:32 17 Q That she did lie under oath. You said that.

01:53:34 18 A I don't know for certain that Megan lied under

01:53:36 19 oath. I posed that question.

01:53:38 20 Q I understand that, that people can ask

01:53:39 21 questions.

01:53:39 22 A Uh-huh.

01:53:40 23 Q It's different than an accusation; right?

01:53:42 24 A Right.

01:53:43 25 Q Like, "We know you a lying ass hoe," do you

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01:53:46 1 see that?

01:53:47 2 A Yes, I do.

01:53:47 3 Q Do you see a question mark at the end of that?

01:53:49 4 A I don't.

01:53:50 5 Q It's not a question, is it?

01:53:51 6 A That is not a question.

01:53:52 7 Q It's an accusation.

01:53:54 8 MS. DIXON: Objection.

01:53:55 9 THE WITNESS: But towards what, though?

01:53:56 10 BY MR. O'SULLIVAN:

01:53:56 11 Q Well, that's what I'm trying to get to.

01:53:57 12 A Okay.

01:53:57 13 Q All right. So --

01:53:58 14 MS. DIXON: Objection as to the

01:53:59 15 characterization. Speculation. And assumes facts not

01:54:03 16 in evidence as far as the word "accusation." It's

01:54:07 17 mischaracterization of the facts.

01:54:10 18 BY MR. O'SULLIVAN:

01:54:10 19 Q Okay. Are you saying that Megan lied at the

01:54:25 20 trial about anything? Under oath.

01:54:28 21 A What I'm saying in this transcript --

01:54:30 22 Q No, not questions. Are you -- let's -- not in

01:54:33 23 this transcript.

01:54:33 24 Have you said that Megan lied under oath at

01:54:36 25 the trial?

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01:54:37 1 A I don't believe so.

01:54:38 2 Q Okay. You don't believe that, do you? Or you

01:54:41 3 don't have evidence of that.

01:54:42 4 A What is the question?

01:54:44 5 Q You are not in a position to make that

01:54:46 6 accusation. You are saying you never said that and you

01:54:48 7 wouldn't, 'cause you don't have the evidence; right?

01:54:50 8 A I said I don't believe that I accused her

01:54:52 9 outright of lying in court. But Megan is a liar per her

01:54:55 10 own admissions. She's lied many times.

01:54:57 11 Q But not in court, not under oath. Yes? And

01:55:00 12 she is explained all those statements.

01:55:01 13 A I want to be clear, because this transcript is

01:55:03 14 in front of me and we played the audio, what are we

01:55:06 15 referencing? My statement here? Or are you bringing up

01:55:09 16 am I accusing her in court of lying?

01:55:11 17 Q I'm trying to find out -- you've said the word

01:55:12 18 "lie, liar, lying."

01:55:14 19 A Right.

01:55:14 20 Q We're going to look at 30 of them today.

01:55:16 21 Okay?

01:55:16 22 A Uh-huh.

01:55:17 23 Q So I want to get your answer on whether you

01:55:18 24 are saying she lied under oath.

01:55:21 25 A Uh-huh.

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01:55:21 1 Q Or you are referring to something else. All
01:55:24 2 right?
01:55:24 3 A Okay.
01:55:24 4 Q I just want to be clear.
01:55:25 5 A In this moment, I'm referring, in general,
01:55:27 6 that in general Megan is a liar.
01:55:29 7 Q Tell me exactly what lies you are accusing of
01:55:32 8 her here?
01:55:33 9 A Megan lied to police. She said it was glass,
01:55:35 10 first. In this moment, this is, in general, that Megan
01:55:37 11 is a liar; so when I said, "Megan is a lying ass hoe --"
01:55:40 12 Q What are you referring to?
01:55:41 13 A Megan lied about sleeping with her best
01:55:43 14 friend's love interest. Megan lied about how -- oh,
01:55:46 15 God. Megan lied to police about the glass injury.
01:55:49 16 Megan came forward and said she was lying to protect
01:55:52 17 people. I mean, she's -- she's lied quite a few times.
01:55:54 18 Q She said all of that under oath to the whole
01:55:57 19 world at trial; right?
01:55:58 20 A Said all of what?
01:55:59 21 Q Explained everything you just said about the
01:56:00 22 reasons she did what she did when she did it; right?
01:56:03 23 The George Floyd and all this other stuff. You heard
01:56:05 24 that; right?
01:56:06 25 A Well, that makes her non-credible, doesn't it?

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01:56:09 1 Q You could ask the jury. They believed her and
01:56:11 2 not Tory; right?
01:56:12 3 A Well, that's -- that's them.
01:56:13 4 MS. DIXON: Objection. Tory didn't --
01:56:14 5 BY MR. O'SULLIVAN:
01:56:15 6 Q That's them -- the jury; right?
01:56:16 7 A Right. But once again, we do have an appeals
01:56:19 8 court.
01:56:19 9 Q Okay. But so far our truth-finding process
01:56:21 10 has found that she was believed. Yes?
01:56:25 11 A Once again --
01:56:25 12 Q That's what our process has produced so far in
01:56:27 13 this case. Yes?
01:56:28 14 A Once again, Megan is a liar, per her own
01:56:30 15 admission. And when I say "Megan is a liar," I'm
01:56:33 16 speaking in general that she is a liar. She told a lie.
01:56:36 17 That makes her a liar. She's told many lies.
01:56:38 18 Q Do you have any -- what was the last part?
01:56:41 19 A When someone lies, they're a liar.
01:56:42 20 Q Okay. But you don't have any personal
01:56:44 21 knowledge about any of that, right, other than what she
01:56:46 22 said? You don't know any of the truths?
01:56:51 23 A I mean --
01:56:52 24 MS. DIXON: Objection. That's not --
01:56:53 25 THE WITNESS: -- in court, she revealed she

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01:56:55 1 was sleeping with Tory; so I can confirm that she did
01:56:58 2 lie when she said she didn't. Yeah.
01:57:00 3 BY MR. O'SULLIVAN:
01:57:00 4 Q On a TV show?
01:57:02 5 A On "Gayle King."
01:57:03 6 Q But she fessed up in court. Yeah?
01:57:04 7 A Which means she lied. Because in court, she
01:57:06 8 said, "Yes, I did sleep with him."
01:57:08 9 Q I understand. But just in the exercise we're
01:57:09 10 doing --
01:57:09 11 A Uh-huh.
01:57:09 12 Q -- where accusing somebody of perjury --
01:57:12 13 A Uh-huh.
01:57:13 14 Q -- which I want to understand if you are doing
01:57:18 15 that.
01:57:19 16 A I do not believe I did.
01:57:20 17 Q And you wouldn't do it today?
01:57:22 18 A Wouldn't do what today?
01:57:24 19 Q Say that Megan committed perjury in that?
01:57:27 20 A I would not assert that. I would ask like I
01:57:29 21 did before.
01:57:29 22 Q Just ask?
01:57:30 23 A I would ask, did Megan perjure herself. When
01:57:32 24 the expert said there was no nerve damage, then why did
01:57:36 25 she say there was?

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01:57:37 1 Q A jury heard the whole thing, and they
01:57:40 2 convicted; right? Based on all the evidence, all the
01:57:42 3 things you are talking about, everyone took it all into
01:57:44 4 account, and they convicted; right?

01:57:46 5 A They did. But the biggest names in our
01:57:47 6 industry did not believe her. The public didn't believe
01:57:49 7 her, and I think that's why --

01:57:51 8 Q They weren't in the box.

01:57:52 9 A -- there was so much contention.

01:57:53 10 I understand. But I don't think it would be
01:57:55 11 the type of topic it is, and I don't think that
01:57:57 12 Joe Budden, "The Breakfast Club," and just the major
01:58:01 13 players -- Akademiks, would speak on it and assert that
01:58:03 14 she's a liar themselves if they did not believe it to be
01:58:06 15 true also.

01:58:07 16 Q Why?

01:58:07 17 A I wasn't the only one.

01:58:08 18 Q Why? Why wouldn't they just make it up for
01:58:10 19 attention?

01:58:11 20 A No one needs to do that.

01:58:12 21 Q They all need to do it.

01:58:13 22 Isn't is that how you get ratings?

01:58:15 23 A No. No one likes someone tearing down a woman
01:58:17 24 that has allegedly been hurt; so no.

01:58:20 25 Q You do a pretty good job on there, calling her

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01:58:22 1 a B-word and -- right?

01:58:24 2 A But, to your point, it wouldn't help me; so I
01:58:26 3 would have to really believe that she's a liar to go
01:58:29 4 against the grain.

01:58:31 5 Q But you've already told me there's no way you
01:58:32 6 could independently know that; right? You don't have
01:58:34 7 access to the evidence. You weren't there. You don't
01:58:35 8 have personal knowledge.

01:58:36 9 You are never going to be in a position to
01:58:39 10 conclusively say -- answer that question; right?

01:58:41 11 A Are you referring to the case, or now me
01:58:43 12 calling her a liar in general?

01:58:44 13 Q I think we've distinguished; right? You --
01:58:46 14 you -- if you didn't say it before, you are saying right
01:58:48 15 now you are not in a position to call -- to say that she
01:58:51 16 lied at trial; right?

01:58:52 17 A I cannot assert that she lied at trial.

01:58:54 18 Q Okay. And if you said that, you take it back?

01:58:56 19 MS. DIXON: Objection.

01:58:57 20 THE WITNESS: I did not say that.

01:58:59 21 BY MR. O'SULLIVAN:

01:59:05 22 Q Okay.

01:59:06 23 MR. O'SULLIVAN: Let's mark this as 46.

01:59:23 24 For the record, we've marked as Exhibit 46,
01:59:26 25 appears to be a tweet. It's got a Bates mark FTI --

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01:59:34 1 this is, I believe, from your production --

01:59:37 2 THE WITNESS: Uh-huh.

01:59:37 3 MR. O'SULLIVAN: -- 13816.

01:59:39 4 (Exhibit 46 was marked for identification.)

01:59:39 5 BY MR. O'SULLIVAN:

01:59:39 6 Q And it looks like this is what we've been

01:59:43 7 talking about -- Milagro, MobzWorld, Go to my likes.

01:59:46 8 Yeah?

01:59:46 9 A Yes.

01:59:47 10 Q Okay. And that says 6/8/24.

01:59:50 11 That's the date that -- that you first saw the

01:59:52 12 video of Meg. Yeah?

01:59:53 13 A What day? June 8th. Yes.

01:59:55 14 Q All right. And it says, "10:34 AM, go to my

01:59:57 15 likes, 5.7K views."

02:00:00 16 I guess, just sticking with the top there, is

02:00:04 17 this, in fact, the tweet you sent out at 10:34 on 6/8/24

02:00:09 18 about your likes?

02:00:10 19 A Yes.

02:00:10 20 Q Okay. And at the time you did that, on your

02:00:17 21 likes was a like of the post about the Deepfake video;

02:00:23 22 right?

02:00:23 23 A It was a post about the Deepfake video.

02:00:25 24 Q Right. And we've discussed that if you click

02:00:27 25 enough times on that, you are going to get to the video;

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02:00:29 1 right?

02:00:30 2 A I believe it will take you to another site.

02:00:32 3 Q Okay. And then, just so I know, these --

02:00:33 4 like, the 5.7K views, is that the number of people who

02:00:37 5 viewed this text? This tweet?

02:00:40 6 A Yes.

02:00:41 7 Q All right. And all this stuff about quotes

02:00:43 8 and bookmarks and --

02:00:49 9 A What you see here is -- something is missing.

02:00:53 10 So this post was "quote tweeted." So the actual post

02:00:56 11 that has the 613199, that's not present here. Whatever

02:01:05 12 that is.

02:01:06 13 Q Okay. So then going to the bottom --

02:01:08 14 A Uh-huh.

02:01:08 15 Q -- Milagro at MobzWorld, you also -- you wrote

02:01:13 16 this; right?

02:01:14 17 A Uh-huh.

02:01:15 18 Q "Yeah. Go to my likes. That could have been

02:01:17 19 related to anything."

02:01:18 20 You just told me that before; right?

02:01:20 21 A Yeah.

02:01:20 22 Q It could have been anything. But then you

02:01:22 23 say, but -- just read the rest of it.

02:01:25 24 A It says, "But I ain't no lying ass hoe, cough.

02:01:29 25 It was so that people could see the video another X user

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02:01:32 1 posted. What would the lawsuit for that be?"

02:01:37 2 Q So that was the point -- is to get them look
02:01:40 3 at the video; right?

02:01:41 4 A Well, sometimes we misspeak. So when I said
02:01:42 5 "video," I should have said "post" because it was a
02:01:46 6 post.

02:01:46 7 Q You just thought of that after the fact.
02:01:48 8 Though; right?

02:01:48 9 A No. I'm explaining to you that sometimes you
02:01:51 10 tweet, and you are tweeting fast and you speak out of
02:01:53 11 turn, and you use the wrong term.

02:01:54 12 So you are talking about a Deepfake video, the
02:01:57 13 topic at hand was the video; so what I should have said
02:02:00 14 was post.

02:02:01 15 Q Well, what do you mean "should have"? This
02:02:03 16 is -- this is you writing in real time.

02:02:04 17 This is what you told them; right?

02:02:07 18 A And that's the problem. Sometimes when we
02:02:09 19 write in real time and speak in real time, we make
02:02:11 20 mistakes.

02:02:12 21 Q Are you saying it's -- it's less bad for you
02:02:19 22 if you sent them to look at the post as opposed to the
02:02:22 23 video? Do you think there's a distinction?

02:02:25 24 A For me, I felt -- I knew that my intent was to
02:02:28 25 discuss the headline itself, not for people to

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02:02:31 1 necessarily go see Megan in a compromising position.

02:02:35 2 Q So why didn't you just put it on your own
02:02:37 3 site -- the headline. You can talk about it all by
02:02:40 4 yourself without the video?

02:02:41 5 A I hadn't had time to really look into it
02:02:42 6 enough. Like I told you, I had already been in an
02:02:44 7 altercation -- well, verbal application with Cardi. It
02:02:47 8 was brought to my attention. So as it's happening, I
02:02:49 9 tweeted "Go to my likes" so people could see what I was
02:02:53 10 referencing, but that's why it wasn't something that was
02:02:55 11 broadcast on my main platform as they show. And I also
02:02:58 12 have a website; so --

02:03:00 13 Q And you are asking what would the lawsuit for
02:03:02 14 that be; right?

02:03:03 15 A Right.

02:03:04 16 Q And you found out.

02:03:06 17 A I found out --

02:03:07 18 Q Right?

02:03:07 19 A -- that I was accused of -- of --

02:03:09 20 Q You got a lawsuit for that.

02:03:12 21 MS. DIXON: Objection. Argumentative.

02:03:13 22 BY MR. O'SULLIVAN:

02:03:13 23 Q Right?

02:03:14 24 A Uh-huh.

02:03:15 25 Q You now know what the lawsuit for that is;

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02:03:17 1 right? You were sued for defamation.

02:03:19 2 A I understand the -- well, not for defamation
02:03:22 3 for the video.

02:03:22 4 Q I'm sorry. Yes. For the Deepfake. You are
02:03:25 5 sued under the statute that prohibits that in promoting
02:03:28 6 those.

02:03:28 7 A Right. I understand that I've been sued for
02:03:30 8 that, but I think that it doesn't make sense.

02:03:34 9 Q Okay. And prior to saying, "Go to my likes"?

02:03:40 10 A Uh-huh.

02:03:40 11 Q Did you make any effort to find out whether
02:03:42 12 the video was fake? Did you try to find out at least
02:03:47 13 what Megan had said about it?

02:03:49 14 A No, I didn't.

02:03:51 15 Q Did -- at some point after you said, "Go to my
02:03:53 16 likes," did you find out that Megan said it's fake?

02:03:57 17 A At some point after? No. Megan -- I believe
02:04:02 18 she said that people want to hurt her, or something like
02:04:04 19 that. But I don't believe she -- I don't think she
02:04:07 20 already said, "That's not me in the video." I just
02:04:09 21 think she said people trying to hurt me. "Y'all want to
02:04:11 22 hurt me so bad." Something like that.

02:04:14 23 Q Sitting here today, as far as you know, she
02:04:15 24 never said it wasn't her?

02:04:17 25 A I'm not aware of her asserting that it wasn't

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02:04:19 1 her. I don't believe so.

02:04:20 2 Q Did you make any effort, having sent everybody
02:04:22 3 to go look at it, to really get sure about whether it
02:04:26 4 was her or not?

02:04:26 5 A I don't believe I sent people to look at it.

02:04:29 6 But, like I said, when I looked at it, I
02:04:31 7 thought enough of it. I thought it was very possible it
02:04:33 8 could be her based on the way she raps. And publicly
02:04:36 9 she's been tied to a couple of things -- a situation
02:04:38 10 with Kelsey and Tory. I thought it was very possible.

02:04:41 11 Q But is that your standard -- very possible. I
02:04:43 12 mean, if that was your daughter in the video, would you
02:04:45 13 say, "Oh, it's very possible it's her. I'll pass it
02:04:47 14 along." Like, aren't you worried about being wrong
02:04:49 15 there?

02:04:49 16 A Well, when you are in the entertainment field
02:04:51 17 and something trends, if it is or if it isn't, the point
02:04:54 18 is to discuss what is happening in the world.

02:04:56 19 Q Even if it's false, you say screw it. I'll
02:04:58 20 pass it along. And let's talk about the false stuff.

02:05:00 21 A Well, that's my point. That's why I didn't
02:05:03 22 tweet "Go to Bimbella.com." If I wanted them to see the
02:05:06 23 video versus a headline, I could have very easily posted
02:05:08 24 it. Like I said --

02:05:08 25 Q You could have posted the headline right here;

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02:05:10 1 right? It takes one line.

02:05:13 2 A To me --

02:05:14 3 Q Questionable Megan Deepfake, whatever. Let's
02:05:17 4 talk about it.

02:05:17 5 A Had I -- had I posted that, then I feel like
02:05:20 6 that's when it would have turned into a thing.

02:05:22 7 So like I said, I did not have time to
02:05:24 8 research it in that way. It was a very intimate
02:05:26 9 audience, and we were there discussing something
02:05:28 10 entirely different. It wasn't even focused on Megan.
02:05:31 11 This happened during -- discussing Cardi B. and my
02:05:33 12 altercation with her.

02:05:34 13 Q Uh-huh. Does Cardi B. have anything to do
02:05:38 14 with this? You keep bringing her up in this.

02:05:41 15 A Well, because this day, that's what I was
02:05:42 16 doing. And this is what I was doing literally at this
02:05:46 17 time. At the time this is going on, and as I'm
02:05:48 18 tweeting -- I'm streaming and I'm discussing and going
02:05:51 19 back and forth actively with Cardi.

02:05:53 20 Q Uh-huh. Where -- where -- this Exhibit 46,
02:05:57 21 what is this? This is from your production? Is this
02:06:00 22 a -- something you put together? Is it just a Twitter
02:06:03 23 page? Is it a combination of things?

02:06:04 24 A That's the Twitter page that's been suspended.

02:06:07 25 Q Say again.

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02:06:08 1 A A Twitter page that has been suspended. It's
02:06:10 2 a tweet.

02:06:11 3 Q Okay. It's a tweet that's been suspended.

02:06:14 4 Is it two tweets? There's "Go to my likes,"
02:06:15 5 and there's the stuff at the bottom.

02:06:18 6 A Yeah, there's two tweets. Like I told you,
02:06:19 7 whatever tweet is above that is not present in this
02:06:22 8 screenshot. I don't know what that said.

02:06:26 9 Q And this message, "Yeah, go to my likes," that
02:06:29 10 could have been related to anything; right? And you are
02:06:31 11 saying that even that now. That's your -- that's your
02:06:34 12 protection; right?

02:06:35 13 A Uh-huh. It's not protection. It's the truth.
02:06:37 14 Because, on Twitter, they were not privy to
02:06:39 15 the conversation on STATIONHEAD. So when someone on
02:06:41 16 Twitter would have seen "Go to my likes," they would
02:06:43 17 have seen thousands of likes; so --

02:06:47 18 Q So you can say that now, and say I wasn't
02:06:49 19 specifically doing it, but then right here, in the next
02:06:51 20 line, you say "I'm not a liar. I did it so they could
02:06:54 21 see the video that was posted there."

02:06:56 22 You just flat out said it; right?

02:06:58 23 A And, like I told you, for me, it was about
02:07:01 24 bringing attention to the story, not necessarily the
02:07:03 25 video and Megan. About the story.

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02:07:05 1 So I misspoke. I should have said so the
02:07:07 2 other people could see the post another X user posted.
02:07:12 3 (The Court Reporter requested clarification.)
02:07:12 4 THE WITNESS: Post another X user posted.
02:07:12 5 BY MR. O'SULLIVAN:
02:07:13 6 Q Okay.
02:07:38 7 MR. O'SULLIVAN: This is going to be 47.
02:07:51 8 I'll give it to your lawyer.
02:07:52 9 MS. DIXON: Thank you.
02:07:52 10 MR. O'SULLIVAN: For the record, I've marked
02:07:54 11 as Exhibit 47 documents with Bates range MG52012.
02:08:08 12 (Exhibit 47 was marked for identification.)
02:08:09 13 MR. O'SULLIVAN: I think this is produced by
02:08:10 14 your -- your side. And --
02:08:14 15 MS. DIXON: Uh-huh. What's the number for
02:08:15 16 this one?
02:08:16 17 MR. O'SULLIVAN: On the bottom? It's 47.
02:08:18 18 MS. DIXON: Oh.
02:08:19 19 MR. O'SULLIVAN: 47. I'm sorry.
02:08:20 20 MS. DIXON: Yeah.
02:08:20 21 BY MR. O'SULLIVAN:
02:08:21 22 Q And, actually, if you don't mind, if you would
02:08:23 23 take a minute, Ms. Cooper, and just go through and just
02:08:27 24 quickly look what's here. I think it's from your files,
02:08:30 25 and you will recognize it, but I just want to --

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02:08:44 1 A Okay.

02:08:44 2 Q Okay. Ms. Cooper, Exhibit 47, it looks like a

02:08:52 3 combination of a bunch of separate things.

02:08:54 4 Do you now how this was put together?

02:08:58 5 A I believe that I took a screenshot and made,

02:09:00 6 like, a PDF file.

02:09:02 7 Q Okay. A PDF file of -- of?

02:09:06 8 A Tweets.

02:09:06 9 Q Of different tweets?

02:09:07 10 A Yes.

02:09:08 11 Q And what was the -- do you know when you did

02:09:12 12 that, roughly?

02:09:13 13 A I'm sorry. I don't.

02:09:14 14 Q Is it part of this case? Getting ready for

02:09:16 15 the case?

02:09:16 16 A Yes.

02:09:17 17 Q Okay. And your lawyers said gather some

02:09:19 18 things, and this is among the things you gathered. I

02:09:23 19 don't need their words. I'm just -- what caused you to

02:09:24 20 do this? Lawyer?

02:09:26 21 A Yeah, per the interrogatories. Yeah.

02:09:28 22 Q Okay. And what steps did you go through to

02:09:33 23 put this together? You just searched --

02:09:37 24 A It simple. I put a -- yeah. I went back to

02:09:39 25 that date on my Twitter.

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02:09:40 1 Q Okay.

02:09:40 2 A And then I took screenshots and made a PDF

02:09:43 3 file from it.

02:09:44 4 Q Okay.

02:09:44 5 A Because I don't know how to export it

02:09:46 6 otherwise.

02:09:46 7 Q Okay. And I guess we'll just go through them.

02:09:53 8 The -- the -- so, for example, at the very

02:09:55 9 top, 12:51, on 6/8, is this -- this is something you

02:10:00 10 posted to your Twitter?

02:10:02 11 A Yes.

02:10:02 12 Q Okay. "Don't take the bait and repost

02:10:05 13 that" -- whatever.

02:10:05 14 What's that mean? What were you trying to say

02:10:08 15 there?

02:10:08 16 A I was saying don't repost a video -- don't

02:10:11 17 repost that video. Any video that may come across as --

02:10:16 18 that's supposed to be Megan in that position, don't

02:10:18 19 repost it.

02:10:19 20 Q Okay. Why? Why were you saying that?

02:10:24 21 A I was saying that because you have someone who

02:10:28 22 has already been through a lot, and you come out

02:10:31 23 reposting this video, that could be something that, you

02:10:35 24 know, could make people look at her crazy; so don't

02:10:37 25 repost it. I just felt like it would be stupid.

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02:10:41 1 Q I mean, it's damaging for her for that to be
02:10:43 2 out there; right?

02:10:44 3 A The video? I don't know. She's pretty
02:10:46 4 promiscuous in her music, but for some people -- you
02:10:50 5 never know how people are going to take it. I just
02:10:53 6 didn't think it was a positive thing; so I felt like
02:10:55 7 don't repost it.

02:10:56 8 Q You -- whatever way you got to see it, that
02:10:58 9 wasn't something you understood was put out by Megan;
02:11:00 10 right? She didn't choose to have that out there?

02:11:03 11 A I couldn't say.

02:11:03 12 Q You didn't know either way?

02:11:05 13 A I didn't know where it came from.

02:11:06 14 Q As far as you knew, she hadn't consented to
02:11:10 15 that image being out there; right?

02:11:12 16 A I didn't know anything.

02:11:13 17 Q So you certainly didn't know that she
02:11:15 18 consented to it, if you didn't know anything; right?

02:11:17 19 A I didn't not know if she had consented or not.

02:11:19 20 Q Right. You didn't care?

02:11:20 21 A I wouldn't say I didn't care. I did not know.

02:11:22 22 Q Okay. Would that be important to you before
02:11:26 23 you passed it along?

02:11:28 24 A I don't feel as though I passed it along, but
02:11:30 25 her response to it would be important. But, once again,

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02:11:33 1 she's a public figure. She's very famous. The story
02:11:35 2 itself existing, true or not, is still a story.

02:11:38 3 Q So you can lie about them if they're famous,
02:11:40 4 or at least talk about lies about them?

02:11:42 5 MS. DIXON: Objection. Argumentative.

02:11:43 6 THE WITNESS: You can -- you can discuss
02:11:45 7 conversations. So it was a public topic, and we
02:11:48 8 discussed it. So it's not about discussing, lying, or
02:11:51 9 anything like that. It's just about what is happening
02:11:53 10 in the world.

02:11:54 11 BY MR. O'SULLIVAN:

02:11:54 12 Q Right. But you start with some accusation,
02:11:55 13 which could be true or false, and then you say let's
02:11:58 14 talk about whether they're this. That's what you do.

02:12:00 15 A Well, not the accusation, it was a video. So
02:12:03 16 it was more so this is supposed to be out, and then the
02:12:06 17 conversation around that.

02:12:07 18 Q Right. And I'll go look at it before we
02:12:09 19 decide if it's real or fake?

02:12:10 20 A Well, we wouldn't have been able to decide.
02:12:11 21 We're not Megan.

02:12:14 22 Q Okay. Next one down, 12:45. "I think there's
02:12:18 23 some people that want it to be her anyway."

02:12:21 24 What did you mean by that?

02:12:23 25 A There was someone, on my Discord, tagging me

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02:12:26 1 and continuing to bring this situation to my attention,
02:12:28 2 and I was annoyed. And so I said, "I think there's some
02:12:32 3 people that want it to be her, like, anyway." Like,
02:12:34 4 leave me alone. I was over it. 'Cause once again, I
02:12:38 5 was going back and forth.

02:12:41 6 Q All right. Next one, "With the way Deepfake
02:12:44 7 and AI be going these days, if it's not her, she should
02:12:48 8 sue whoever made it. That" -- whatever.

02:12:51 9 On page 0006, Exhibit 47, 12:22, does that
02:13:02 10 accurately show what you put out there?

02:13:04 11 A Yes.

02:13:05 12 Q And at the time you did this, had you
02:13:12 13 attempted to find out what Megan's position on the
02:13:16 14 fake-ness was?

02:13:18 15 A No. At this point, I was still uncertain. I
02:13:21 16 thought that it, very much so, could be her, but I
02:13:23 17 didn't know. So I said with the way that things
02:13:27 18 happened -- there have been many things I couldn't
02:13:30 19 discern if they were real or not because of AI
02:13:32 20 technology; so I said, you know, if it's not her, then I
02:13:36 21 think you should pursue something, because I don't think
02:13:38 22 that's right to do to people.

02:13:39 23 Q Uh-huh. Right. If it was you in the video,
02:13:42 24 would you want people passing it along before they heard
02:13:44 25 what you said, if it was true?

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02:13:46 1 A I understand -- or are you asking me for me,
02:13:49 2 or if I was in Megan's position?

02:13:51 3 Q I'll start with you.

02:13:53 4 A I'm a public figure of sorts. I have learned
02:13:55 5 that when certain things are concerning you, people are
02:13:58 6 going to talk about it.

02:13:58 7 So would I want them to? No.

02:14:00 8 Is it going to happen, and do I understand
02:14:02 9 that it happens? Yes.

02:14:03 10 Q But do you think that -- there's a lot of laws
02:14:06 11 that are being put around the country, right, about
02:14:08 12 deepfake porn videos.

02:14:09 13 Yes, you know that about?

02:14:10 14 (Multiple Simultaneous Speakers.)

02:14:11 15 MS. DIXON: Objection. It calls for a legal
02:14:12 16 opinion.

02:14:13 17 THE WITNESS: I do not know about that.

02:14:15 18 MS. DIXON: Objection. It calls for a legal
02:14:17 19 opinion.

02:14:17 20 BY MR. O'SULLIVAN:

02:14:18 21 Q Do you think that somebody who is famous or is
02:14:20 22 a celebrity has to tolerate deepfake porn because of
02:14:25 23 their celebrity?

02:14:27 24 A No.

02:14:27 25 Q That they don't get the protection of that

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02:14:29 1 law?

02:14:29 2 A I do not believe that.

02:14:31 3 Q Okay. They're entitled to protection of law

02:14:33 4 just like everybody else; right?

02:14:34 5 A Yes.

02:14:35 6 Q It's not okay to circulate a Deepfake porn

02:14:37 7 video of a celebrity just 'cause they're a celebrity;

02:14:40 8 right?

02:14:42 9 A I don't think that -- I don't think that it is

02:14:47 10 considerate. But, in celebrity culture, and the nature

02:14:51 11 of it and what it has become, depending on what it is,

02:14:56 12 it's going to be talked about.

02:14:59 13 Q Because people like you are passing them

02:15:02 14 around and saying it's okay to talk about this, even if

02:15:04 15 it's fake; right?

02:15:05 16 A No, not --

02:15:05 17 (Multiple Simultaneous Speakers.)

02:15:05 18 MS. DIXON: Objection. Assumes facts not in

02:15:06 19 evidence.

02:15:07 20 THE WITNESS: No.

02:15:07 21 BY MR. O'SULLIVAN:

02:15:08 22 Q That's what it's --

23 (Multiple Simultaneous Speakers.)

24 MS. DIXON: Objection. Assumes facts not in

25 evidence. And unduly prejudicial.

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02:15:07 1 THE WITNESS: No.

2 THE COURT REPORTER: Okay. Hold on. I

3 can't -- you guys are talking on top of each other. I

4 can't --

5 MR. O'SULLIVAN: All right.

6 THE COURT REPORTER: Okay. So I got "That's

7 what it is."

8 What was your answer?

02:15:21 9 THE WITNESS: Could you please ask your

02:15:22 10 question again?

02:15:25 11 BY MR. O'SULLIVAN:

02:15:26 12 Q I'll put a new question.

02:15:27 13 Let's go to the next page, 0007.

02:15:34 14 Can you read this.

02:15:37 15 A Uh-huh. It says, "I know this ain't this girl

02:15:39 16 in this video getting fucked. Please tell me you

02:15:41 17 weren't that damn dumb, Megan. And I ain't no crash

02:15:44 18 dummy so, no, I won't be posting shit."

02:15:48 19 Q So what does that last piece mean? You're

02:15:49 20 making it sound like, what, you think you are being set

02:15:50 21 up with this video. If you post it, they're going to

02:15:53 22 come after you.

02:15:54 23 A The way that people continue to try to

02:15:56 24 distract me with it, I thought it was odd, yes. Very

02:15:59 25 much so.

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02:16:00 1 Q And so your solution was -- I'm not going to
02:16:06 2 post it, but I'm going to like it and send them to my
02:16:09 3 likes; right?

02:16:11 4 A Yes. Once again, I report on the news. I'm a
02:16:14 5 public figure, a media figure. And it is my job to
02:16:17 6 report on what is going on with entertainment news.

02:16:19 7 Q Well, it's -- you are not a reporter, are you?

02:16:22 8 A I would consider myself that at this point.

02:16:26 9 Q Okay.

02:16:26 10 A And someone in media and a media personality.
02:16:28 11 And I disseminate news, yes.

02:16:31 12 Q Have you had any training in journalism?

02:16:32 13 A Yes, I would say so. Not formal, not college.
02:16:35 14 But I would say so, yes.

02:16:37 15 Q Tell me about ethical training. The ethics of
02:16:40 16 journalism.

02:16:41 17 A No, not that.

02:16:42 18 Q Do you know what the ethics of journalism --
02:16:44 19 do you know if there's ethical issues, in doing what you
02:16:47 20 are doing here, for journalists?

02:16:49 21 A I do not know that. I don't have a background
02:16:51 22 in that, and I'm not aware.

02:16:52 23 Q But you were -- you felt like you could just
02:16:54 24 wing it?

02:16:54 25 A Wing what?

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02:16:55 1 Q Putting this stuff out there without knowing
02:16:57 2 whether that was journalistically appropriate?

02:16:59 3 A I feel like in my media space -- because
02:17:01 4 journalism has shifted. It's not newspapers and writing
02:17:05 5 anymore. It's a -- people like me on camera, on stream,
02:17:09 6 creating shows and stuff like that.

02:17:10 7 So, in my space, yeah, I do feel like it was
02:17:13 8 important for me to discuss.

02:17:16 9 Q Do you think there's any rules about being
02:17:19 10 truthful in your reporting?

02:17:21 11 A Of course.

02:17:22 12 Q Is there any rules about diligence in your
02:17:24 13 reporting?

02:17:24 14 A Of course.

02:17:25 15 Q Is there any rules about being balanced in
02:17:27 16 your reporting?

02:17:28 17 A I would imagine so.

02:17:30 18 Q Any --

02:17:31 19 A But it when you say "rules," I don't have any
02:17:33 20 formal training in those different things. So rules --
02:17:37 21 it was to my discretion.

02:17:39 22 Q Well, that's what I'm saying. You are trying
02:17:41 23 to invoke -- you are saying, oh, I'm a reporter. I have
02:17:43 24 to report.

02:17:43 25 A Right.

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02:17:43 1 Q And you are saying, but I don't look at the
02:17:45 2 rules of reporting. I don't need to be fair like a
02:17:47 3 reporter. I don't need to get the truth like a
02:17:48 4 reporter.

02:17:48 5 (Multiple Simultaneous Speakers.)

02:17:49 6 MS. DIXON: Objection. That's assuming and
02:17:50 7 mischaracterizing.

02:17:52 8 BY MR. O'SULLIVAN:

02:17:52 9 Q I can say what I want. I can spread lies and
02:17:53 10 ask people to gossip about it; right?

02:17:54 11 A No.

02:17:55 12 MS. DIXON: Objection. Argumentative.

02:17:56 13 THE WITNESS: That's not what I'm saying at
02:17:57 14 all.

02:17:57 15 I've stated before I'm not a journalist, in a
02:18:00 16 effort to give respect to people who have taken the time
02:18:02 17 to go to school and do the work.

02:18:04 18 I am in the media field, and I do report on
02:18:07 19 news. I was contracted through STATIONHEAD to do that.
02:18:11 20 That's what I did since 2019 with my position with
02:18:13 21 Onsite!.

02:18:14 22 When I trademarked my name and my Mob Radio,
02:18:17 23 it was for broadcasting news, entertainment, radio
02:18:21 24 hosting, all of that; so, yes, it was, in my opinion, my
02:18:25 25 duty to report on what was happening.

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02:18:27 1 BY MR. O'SULLIVAN:

02:18:28 2 Q Uh-huh. All right.

02:18:28 3 And in this -- on page 7 that we're looking at
02:18:31 4 here, that first sentence, at the time you wrote that,
02:18:36 5 were you uncertain as to whether the video was
02:18:41 6 authentic? Was made by Meg?

02:18:43 7 You didn't know one way or the other; right?

02:18:46 8 A I didn't know, right.

02:18:47 9 Q Okay. Let's go to the next page.

02:18:49 10 All right. At the top, it looks to be -- is
02:18:58 11 this a tweet from -- is that from Megan, that tweet?

02:19:02 12 A Yes.

02:19:02 13 Q All right. And you had this somewhere in
02:19:04 14 your -- in your computer, and you pulled it into this
02:19:06 15 PDF. Yes?

02:19:08 16 A No. I went on her Twitter.

02:19:10 17 Q Okay. And just read that into the record.

02:19:12 18 A [As read] It's really sick how y'all go out of
02:19:14 19 the way to hurt me when you see me winning. Y'all going
02:19:16 20 too far. Fake ass shit. Just know today was your last
02:19:19 21 day playing with me, and I mean it.

02:19:26 22 Q Okay. And there's two of them here.

02:19:28 23 Why did you -- what's the bottom one? Is it
02:19:31 24 different?

02:19:32 25 A It looks to be the same. Maybe just a

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02:19:35 1 screenshot at a different time. I don't -- it's just
02:19:37 2 another screenshot of it. I don't know.
02:19:40 3 Q Okay. And -- and why did you put these two in
02:19:46 4 your -- in your compilation about the deepfake video?
02:19:52 5 A I don't know. I guess just to include
02:19:54 6 everything relative to it and what -- what she said, I
02:19:57 7 guess. I don't know.
02:19:58 8 Q Okay. And this is still the same day; right?
02:20:01 9 June 8th?
02:20:02 10 A Uh-huh.
02:20:03 11 Q And she calls this "fake ass shit"; right?
02:20:06 12 A I see that here, yes.
02:20:07 13 Q Okay. Did that slow you down at all?
02:20:10 14 A By the time that she posted this, I had
02:20:13 15 already deleted my post, and I had already stated don't
02:20:15 16 post it; so there was nothing left for me to do.
02:20:18 17 Q Uh-huh. Okay. There was nothing else left
02:20:25 18 for you to do?
02:20:26 19 A Right. In terms of -- I mean, what else what
02:20:29 20 would I have done in that instance. I don't know.
02:20:31 21 Q Okay. Next page, 09. Same day, June 8th,
02:20:46 22 2:56.
02:20:48 23 Is this copy of a later tweet by you that day?
02:20:51 24 A Yes.
02:20:52 25 Q Next page, with a 10 at the bottom.

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02:21:16 1 What is -- this is 301.

02:21:22 2 What is this -- what are you trying to do here
02:21:25 3 on page 10?

02:21:26 4 A There were different people that once Megan
02:21:28 5 tweeted the tweet that's listed here -- "Just know today
02:21:32 6 was your last day playing with me" -- there were people
02:21:34 7 online saying that she was going to sue me.

02:21:36 8 And I said, "I don't know who she's talking
02:21:37 9 to." And I reposted my previous tweets to re-emphasize
02:21:42 10 that I wasn't trying to cause her harm or do anything
02:21:46 11 against her.

02:21:47 12 Q Well, you said some stuff like that, but you
02:21:49 13 also sent them to go look at it; right?

02:21:51 14 A No. Once again, I told them to go to the
02:21:53 15 post.

02:21:54 16 MS. DIXON: Objection. Asked and answered.

02:21:55 17 THE WITNESS: And on the page that we skipped,
02:21:56 18 my tweet, may I read it?

02:21:59 19 BY MR. O'SULLIVAN:

02:21:59 20 Q If you want.

02:22:00 21 A [As read] Y'all be about to bust a nut, hoping
02:22:02 22 the bitch sues me for these synthetic wigs. I called
02:22:11 23 that bait from the jump. It's not illegal to say "Go to
02:22:14 24 my likes."

02:22:14 25 THE COURT REPORTER: Okay. You have to read

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02:22:14 1 that slower.

02:22:14 2 THE WITNESS: I'm sorry.

02:22:14 3 [As read] It's not illegal to say "Go to my
02:22:14 4 likes" so that social media -- social media users could
02:22:17 5 see what I was referencing. Who posted the tweet an
02:22:21 6 hour before it was brought to my attention? Oh, I even
02:22:24 7 stated that she should pursue charges against whoever
02:22:26 8 did it because that's so wrong to do to people. I never
02:22:29 9 redistributed the content or asserted that it was her in
02:22:32 10 it. Enjoy y'all day.

02:22:34 11 BY MR. O'SULLIVAN:

02:22:34 12 Q Okay. Prior to saying, in this tweet, "It's
02:22:37 13 not illegal to say go to my likes," did you make any
02:22:43 14 effort to find out if that was true? If it was, in
02:22:46 15 fact, illegal to do what you did?

02:22:49 16 A Once again, I was literally saying, "Go to my
02:22:52 17 likes." So when I say, "It's not illegal to say go to
02:22:55 18 my likes," I'm literally referencing tweeting "Go to my
02:22:58 19 likes."

02:22:58 20 Q I get it.

02:23:00 21 A I'm not aware of that being illegal.

02:23:01 22 Q Well, you are being sued for it being illegal;
02:23:02 23 right?

02:23:03 24 A No. I'm being sued because y'all are accusing
02:23:06 25 me of promoting the video.

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02:23:07 1 If I were to tweet "Go to my likes" right now,
02:23:09 2 I don't believe that I would be sued.
02:23:11 3 Q You've been sued for saying "Go to my likes"
02:23:13 4 after you liked --
02:23:15 5 A A particular post y'all are accusing me.
02:23:17 6 Q -- a video that violates the statute.
02:23:18 7 MS. DIXON: Objection.
02:23:18 8 BY MR. O'SULLIVAN:
02:23:18 9 Q So you've been sued for promoting that video
02:23:21 10 by liking it and telling people to "Go to your likes."
02:23:23 11 You understand that; right? That's this case.
02:23:26 12 A I understand the accusation; but, as I told
02:23:29 13 you earlier, I don't agree with it.
02:23:30 14 And I was commenting directly on literally
02:23:32 15 saying "Go to my likes."
02:23:33 16 Q I get it.
02:23:34 17 And I'm just asking you, did anybody tell you
02:23:36 18 that that wasn't illegal? You are asserting it's not
02:23:39 19 illegal; right?
02:23:41 20 A I'm asserting that it is not illegal to
02:23:43 21 literally say, "Go to my likes." I'm not aware of that
02:23:46 22 being a law in the county that you can't say, "Go to my
02:23:48 23 likes."
02:23:49 24 Q Okay. But, if before that you had liked a
02:23:53 25 kiddie porn picture, and it was on your likes for some

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02:23:55 1 awful copyright violation, you understand indirectly
02:23:58 2 you'd get to the same place; right?
02:24:00 3 MS. DIXON: Objection.
02:24:01 4 THE WITNESS: No. I don't understand that.
02:24:02 5 MS. DIXON: I think that's a misstatement of
02:24:03 6 the law.
02:24:03 7 BY MR. O'SULLIVAN:
02:24:03 8 Q All right. Did you get any legal advice
02:24:05 9 before you decided to like the Meg video and then tell
02:24:09 10 people to go to your likes?
02:24:10 11 A I didn't like the video. I liked a post. And
02:24:12 12 no.
02:24:15 13 Q No. Okay.
02:24:21 14 And then on page 11 -- all right. You can
02:24:28 15 read that one.
02:24:29 16 A [As read] Someone said a supposed-compromising
02:24:32 17 video of Megan hit this -- I'm sorry -- hit the
02:24:34 18 timeline, which people are now saying it's a Deepfake.
02:24:38 19 Milagro remarked on it without reposting it, and people
02:24:40 20 are big mad because Milagro brought attention to it.
02:24:45 21 Q And what did you respond?
02:24:46 22 A I said, "And that's not illegal. Suck it."
02:24:49 23 Q Why did you say, "Suck it"?
02:24:52 24 A It's like leave me alone.
02:24:55 25 Q Were you concerned at all, at this point, it

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02:24:57 1 looks like it's a deepfake; right? People are saying
02:25:00 2 that. And you did cause more views; right?

02:25:02 3 Did you have any remorse?

02:25:04 4 MS. DIXON: Objection. Calls for speculation.

02:25:05 5 THE WITNESS: I don't believe that caused more
02:25:07 6 views to the video. I couldn't speak to that but the --

02:25:09 7 BY MR. O'SULLIVAN:

02:25:10 8 Q If you did, do you have any remorse?

02:25:13 9 A Ask me the question again.

02:25:14 10 Q If it turns out that we can show that the
02:25:16 11 likes caused traffic and more people viewed the video,
02:25:18 12 and you were the source of that, do you have remorse for
02:25:21 13 having done that?

02:25:21 14 A I'm not the source of that, and I cannot be
02:25:23 15 remorseful for something I did not do.

02:25:26 16 Q Okay. In fact, your attitude is suck it;
02:25:27 17 right? Meg, suck it?

02:25:29 18 A No. I'm not speaking to Meg here. There are
02:25:31 19 people on the timeline. There were people on social
02:25:34 20 media attacking me; so I was telling them to leave me
02:25:37 21 alone.

02:25:37 22 Q You were telling them to suck it; right?

02:25:39 23 A I'm telling the public to leave me alone.

02:25:41 24 Q Right. Because you did what you did, and you
02:25:42 25 are comfortable with it?

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02:25:43 1 A No. Because I felt like they were looking for
02:25:45 2 something and then waiting for that moment.

02:26:05 3 MR. O'SULLIVAN: Okay. We're done with that.

02:26:15 4 THE WITNESS: Is -- is there -- can we make or
02:26:15 5 can I -- I don't know how this goes. I'm sorry -- make
02:26:18 6 comments about like what's included here? Like, this
02:26:20 7 right here?

02:26:21 8 MR. O'SULLIVAN: No.

02:26:22 9 THE WITNESS: Okay.

02:26:23 10 MR. O'SULLIVAN: I mean, your lawyer can ask
02:26:25 11 you questions at the end. I guess. It's
02:26:26 12 unconventional, but not until I'm done.

02:26:29 13 THE WITNESS: Okay.

02:26:56 14 MR. O'SULLIVAN: Next exhibit is 48. I'll
02:27:07 15 give it to your lawyer.

02:27:08 16 (Exhibit 48 was marked for identification.)

02:27:21 17 BY MR. O'SULLIVAN:

02:27:21 18 Q All right. I have marked as Exhibit 48, a
02:27:26 19 copy of multi-page document. It says "Responses" at the
02:27:29 20 top.

02:27:29 21 And I think the easiest thing is, I'll just
02:27:32 22 ask you, Ms. Cooper, do you know what this Exhibit 48
02:27:35 23 is?

02:27:36 24 A It looks like my responses I gave to my
02:27:39 25 lawyer, I think.

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02:27:40 1 Q Okay. And then I'm going to -- it doesn't
02:27:43 2 have pages. I'm going to go to -- it's about two-thirds
02:27:54 3 of the way in. And it has D, Lack of a Bank Account and
02:27:58 4 then Lack of Deepfake Video Documents.

02:28:02 5 A Okay.

02:28:03 6 Q Are you on that page with me?

02:28:04 7 A Yes.

02:28:04 8 Q Okay. Did you -- did you prepare the text on
02:28:10 9 this page?

02:28:11 10 A Yes.

02:28:12 11 Q Okay. And this was trying to just -- to get
02:28:15 12 down your account of how -- how it went; right?

02:28:17 13 A Yeah. And answer the questions.

02:28:19 14 Q Okay. If you look at in this whole section,
02:28:23 15 E, about the Deepfake --

02:28:25 16 A Uh-huh.

02:28:25 17 Q -- I want you to read through that, all of E.
02:28:50 18 Tell me when you've got through that. It should just
02:29:03 19 be -- it should just be really a page.

02:29:05 20 A Oh.

02:29:05 21 Q Just E. I'm sorry.

02:29:05 22 All right. So let me just do --

02:29:08 23 I'm going to ask a new question.

02:29:11 24 On the page we've been looking at that has the
02:29:12 25 heading E, Lack of Deepfake Video Documents, do you see

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02:29:15 1 that?

02:29:16 2 A Huh-uh.

02:29:16 3 Q Right here.

02:29:19 4 THE WITNESS: It's in the middle.

02:29:20 5 MS. DIXON: It's not numbered. I'm going to

02:29:23 6 it.

02:29:28 7 THE WITNESS: I think it's -- I think it's

02:29:31 8 before that.

02:29:32 9 MR. O'SULLIVAN: It's about seven or eight

02:29:33 10 pages from the back. E. Lack of Deepfake Video

02:29:38 11 documents.

02:29:48 12 MS. DIXON: Is it this? Sorry.

02:30:09 13 THE WITNESS: It might be missing from this

02:30:10 14 packet, actually. I don't think I see it either.

02:30:13 15 MR. O'SULLIVAN: What is it?

02:30:14 16 THE WITNESS: I don't think hers has that

02:30:16 17 particular page. I don't feel like I'm seeing it.

02:30:18 18 MR. O'SULLIVAN: Here, just try another one.

02:30:20 19 THE WITNESS: Okay.

02:30:21 20 MR. O'SULLIVAN: It wasn't a -- it wasn't a

02:30:21 21 trick.

02:30:24 22 BY MR. O'SULLIVAN:

02:30:25 23 Q I think what I'm going to ask you to do,

02:30:28 24 Ms. Cooper, is if you look under E that we talked about

02:30:30 25 and just read that text to the end, where it says,

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02:30:35 1 "Attached to the direct links" -- strike it. I'll read
02:30:38 2 it.
02:30:39 3 A Uh-huh. Okay.
02:30:40 4 Q Bottom line on the page we've been looking at,
02:30:47 5 it says, quote, "I was tagged directly on a Discord
02:30:50 6 server that I manage by a user named Kham K whose real
02:30:55 7 name is Alejandro Burnett." Let me stop there.
02:30:58 8 Does that -- you -- you wrote that; right?
02:31:00 9 A Yes.
02:31:01 10 Q And -- and is it correct still?
02:31:04 11 A Yes.
02:31:05 12 Q True. And do you know this person,
02:31:08 13 Alejandro Burnett, other than through this?
02:31:12 14 A I don't know him personally, no.
02:31:14 15 Q How do you know his real name?
02:31:15 16 A Because someone posted him online. They
02:31:17 17 posted some mug shots of him online, and I saw his name
02:31:19 18 in the mug shot.
02:31:24 19 Q Okay. And the guy from the -- you recognized
02:31:25 20 the -- the mug shot?
02:31:27 21 A Yes. And he, I believe, confirmed it was him,
02:31:29 22 but I definitely recognized him in the photo.
02:31:31 23 Q Okay. And he is the one who put out this
02:31:36 24 video of Megan?
02:31:38 25 A He is the one who posted these things to my

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02:31:40 1 Discord, that brought my attention to it.

02:31:44 2 Q Okay. And -- and the things he posted to the
02:31:47 3 Discord are the things that are listed below there -- or
02:31:49 4 shown below there?

02:31:51 5 A Yes.

02:31:51 6 Q All right. So the first one is him saying
02:31:53 7 "You seen this," and it has a link to something; right?

02:31:56 8 A No. That link is to that post.

02:31:58 9 Q Okay. And then the same thing --

02:32:00 10 A Yes.

02:32:01 11 Q -- this next one. And then down towards the
02:32:05 12 bottom, he is saying, "Hell, yeah, it's her"?

02:32:09 13 A Yeah. And I hadn't seen the video, so he
02:32:14 14 says, "It shows this." 'Cause I was, like, I'm not
02:32:16 15 clicking it. I'm not putting that on my phone.

02:32:17 16 And so he was telling me, "Oh, this is what it
02:32:19 17 is" because I didn't look at it.

02:32:23 18 Q And so what is this? This is a picture of the
02:32:26 19 front page of the video link?

02:32:29 20 A This is when -- I believe he goes to Bimbella.
02:32:32 21 And when he went to Bimbella, this is what his screen
02:32:36 22 showed, and he took a screenshot of that and posted that
02:32:39 23 on Discord.

02:32:50 24 Q Uh-huh. Okay.

02:32:50 25 And do you know what Alejandro's -- do you

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02:32:55 1 have any reason to believe he is a reliable or
02:32:57 2 unreliable source of truth? Besides the mug shot?

02:33:03 3 A Right. I don't know.

02:33:04 4 Q Is he a criminal?

02:33:06 5 A I don't know his background.

02:33:10 6 Q Do you have -- do you know anything about
02:33:12 7 his -- his trustworthiness?

02:33:20 8 A I don't know him personally. All I know is
02:33:22 9 what he has presented online; so I don't know.

02:33:24 10 Q Okay. Did -- did your lack of knowledge about
02:33:31 11 him, other than the mug shot, cause you to doubt the
02:33:34 12 veracity of the video?

02:33:36 13 Were you skeptical because of where it was
02:33:40 14 coming from?

02:33:42 15 A No, not necessarily. Because many people were
02:33:44 16 bringing it up. It wasn't just him. He just brought it
02:33:49 17 to my attention.

02:33:51 18 Q Right. And did he say why?

02:33:54 19 A I think because people expect me to speak on
02:33:56 20 trending topics.

02:33:59 21 Q Okay. And, before he put this out, there was
02:34:03 22 no trending topic; right?

02:34:06 23 A It was trending. That's how it was brought to
02:34:08 24 my attention.

02:34:09 25 Q It became trending when you posted it -- or

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02:34:11 1 when you directed people to it.

02:34:12 2 MS. DIXON: Objection. Calls for speculation.

02:34:13 3 THE WITNESS: No. It was already a

02:34:15 4 conversation. There were already Reddit threads about

02:34:18 5 it. There were already -- I believe I may have saw it a

02:34:20 6 day after it was put online, actually. I saw it

02:34:23 7 significantly, like, after.

02:34:32 8 MR. O'SULLIVAN: Okay. I got to start going

02:34:38 9 faster. 39.

02:34:42 10 For the record, I've marked as Exhibit 49, a

02:34:58 11 one-page document. It's got Bates MG494.

02:35:05 12 (Exhibit 49 was marked for identification.)

02:35:06 13 BY MR. O'SULLIVAN:

02:35:06 14 Q And I'll ask you, Ms. Cooper, if you recognize

02:35:09 15 what's being depicted in Exhibit 49?

02:35:11 16 A I do. This is the user, the Instagram user

02:35:16 17 who sent me the link that I was able to see the video

02:35:19 18 from.

02:35:21 19 Q Okay. And, prior to that, do you know who

02:35:23 20 this person is, LV Don X Paris?

02:35:29 21 A No.

02:35:30 22 Q All right. So no prior communication with

02:35:33 23 him?

02:35:35 24 A I believe that this person has sent me

02:35:37 25 trending topics before; so there may have been a couple

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02:35:39 1 of other messages that were maybe some stories or links
02:35:42 2 to stories.

02:35:43 3 Q Can you remember any of the other stories?

02:35:46 4 A No. And the person deleted their page; so I
02:35:50 5 couldn't go back and see. No.

02:35:53 6 Q Were any of the prior stories involving
02:35:54 7 deepfake porn videos?

02:35:56 8 A No.

02:35:57 9 Q Okay. Do you remember the subject matter of
02:35:59 10 the prior stories he might have tipped you off on?

02:36:02 11 A I don't. But I can tell, even by this right
02:36:05 12 here, that this is scrolled down to the bottom; so
02:36:08 13 there's something above that. So, no, I don't know what
02:36:10 14 that was but --

02:36:11 15 Q Oh, I see.

02:36:12 16 A Yeah. So he's sent me something before.

02:36:14 17 Q And what -- is this Twitter?

02:36:18 18 A This is Instagram.

02:36:19 19 Q Instagram?

02:36:19 20 A Direct Messages.

02:36:21 21 Q And so, just so I understand, so at the top
02:36:23 22 where it says, "Someone just sent me this link to MTS
02:36:26 23 sex tape," who wrote that? Him or you?

02:36:28 24 A He did.

02:36:29 25 Q And is it a guy -- do you know, is it a man?

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02:36:32 1 A I don't know.

02:36:34 2 Q Do you know anything about the trustworthiness

02:36:36 3 of LV Don X Paris?

02:36:39 4 A I don't.

02:36:40 5 Q Okay.

02:36:54 6 MS. HAYRAPETIAN: Can we please pull up 43-A?

02:37:00 7 STENO TECH ASSISTANT: Did you say 43-A?

02:37:02 8 MR. O'SULLIVAN: Yes. So this will be 43-B;

02:37:04 9 right?

02:37:05 10 MS. HAYRAPETIAN: Yes.

02:37:05 11 STENO TECH ASSISTANT: Okay. One moment.

02:37:06 12 (Off-the-record discussion between the Court Reporter

02:37:06 13 and Counsel.)

02:37:48 14 MS. DIXON: And the video is 50-A.

02:37:51 15 MS. HAYRAPETIAN: 43 was just the interim

02:37:51 16 number.

02:37:55 17 MS. DIXON: Okay. Thank you.

02:37:57 18 STENO TECH ASSISTANT: Let me know whenever

02:37:58 19 you'd like for me to play it.

02:37:59 20 MR. O'SULLIVAN: We're ready for you.

02:38:01 21 STENO TECH ASSISTANT: Okay.

02:38:02 22 (A video clip was played.)

02:38:52 23 (Exhibit 50-A was marked for identification.)

02:38:52 24 (Exhibit 50-B was marked for identification.)

02:38:52 25

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02:40:13 1 BY MR. O'SULLIVAN:

02:40:14 2 Q All right. So, first of all, is that you that
02:40:19 3 we just heard talking?

02:40:20 4 A Yes.

02:40:20 5 Q Okay. And you said all that stuff we just
02:40:22 6 heard?

02:40:22 7 A Yes.

02:40:23 8 Q Okay. And who was the audience? Were you
02:40:25 9 on -- what platform were you on?

02:40:28 10 A This is STATIONHEAD.

02:40:29 11 Q Okay. Is it on anywhere else?

02:40:30 12 A No.

02:40:31 13 Q Anything -- is Discord involved in this?

02:40:34 14 A No.

02:40:34 15 Q Okay. And is this before or after you said,
02:40:42 16 "Check my likes"?

02:40:45 17 A I couldn't say.

02:40:48 18 Q Is -- based on listening to it, is this when
02:40:52 19 you were seeing the video for the first time?

02:40:53 20 A I believe so.

02:40:54 21 Q So probably sent people to your likes after
02:41:01 22 this?

02:41:02 23 A No. Because the link that I was referencing
02:41:04 24 is on Instagram. So it was something completely
02:41:06 25 different than what was on Twitter.

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02:41:08 1 Q I understand. But timing-wise?

02:41:10 2 A I couldn't say. STATIONHEAD -- I mean,
02:41:12 3 there's not a lot -- I don't know what time it was. I
02:41:15 4 don't know.

02:41:16 5 Q Do you -- do you agree that what we just heard
02:41:20 6 was you looking at it for the first time? You were
02:41:22 7 reacting to it for the first time; right?

02:41:24 8 A It seemed like it. Yeah.

02:41:25 9 Q Okay. At the end you say, "I'll never post
02:41:30 10 that on my MFing page."

02:41:32 11 Do you see that?

02:41:33 12 A Yes.

02:41:34 13 Q Why? Why wouldn't you post that on your page?

02:41:37 14 A Because, at that point, I felt like that's
02:41:39 15 when I would get in trouble.

02:41:42 16 Q And what would you get in trouble for?

02:41:44 17 A I don't know. I don't know the rules around,
02:41:45 18 like, posting pornography or stuff like that, but I
02:41:48 19 didn't feel like that would be something smart for me to
02:41:52 20 do.

02:41:53 21 Q Okay. And how did you get from there to a
02:41:59 22 like it and then tell people to "Go to my likes"?

02:42:01 23 A Because, once again, it wasn't for me about if
02:42:04 24 it was her or trying to make it her or trying not to
02:42:06 25 make it her. It was about Megan, one of the biggest

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02:42:09 1 stars in the world, is involved in something.

02:42:12 2 Q Or not. Or it's completely fake, and she's
02:42:14 3 not involved.

02:42:15 4 A It wasn't about if it was fake or not. When
02:42:16 5 something happens with a celebrity, people care about
02:42:19 6 the celebrity. A certain celebrity could eat a sandwich
02:42:22 7 and people care, but I eat a sandwich, they don't care.

02:42:25 8 Q Okay. But somebody could say that the
02:42:27 9 celebrity killed everybody in their neighborhood; right?

02:42:30 10 A Uh-huh.

02:42:30 11 Q And you could start talking about that, like,
02:42:32 12 who knows, did they, and are they a murderer, without
02:42:35 13 ever checking if it really happened; right? That's one
02:42:38 14 choice. And that's the choice you made about this.

02:42:41 15 A No. The way that things work, for me, is that
02:42:44 16 when something happens with a celebrity, regardless of
02:42:46 17 what's behind it, the fact that it happened, is a part
02:42:49 18 of our culture. It's a part of bigger conversations.

02:42:51 19 So the -- the aftermath is another story. The
02:42:55 20 fact that these things happened, it's -- it's worthy to
02:42:59 21 discuss, if it happens to the right person. If the
02:43:01 22 right person -- if the person has enough notoriety, you
02:43:04 23 know, and they're a big star like Megan, she's huge,
02:43:07 24 anything Megan does, people want to talk about it.

02:43:10 25 Q And you think it's okay, even if it's a lie,

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02:43:12 1 to talk about it?

02:43:13 2 A I think that it's okay to discuss public
02:43:15 3 matters about celebrities.

02:43:16 4 Q And you think even lies -- if someone throws
02:43:18 5 them out there, turn them into public matters which
02:43:21 6 anyone can repeat and talk about?

02:43:22 7 A I think that we have a lot of entertainment
02:43:25 8 shows, and the culture loves trending topics in
02:43:27 9 entertainment news.

02:43:29 10 Q Okay. So, if lying is good for ratings, go
02:43:32 11 for lying?

02:43:32 12 A Well, I did not lie because I didn't assert or
02:43:34 13 deny that it was her. All I did was talk about the
02:43:37 14 topic at hand, which was the fact that, hey, allegedly
02:43:40 15 there's a video out.

02:43:41 16 Q Right. And you were hoping the shock and the
02:43:43 17 attention of something like that would inure to your
02:43:47 18 benefit. That people would -- through you, would see
02:43:49 19 that very interesting thing; right?

02:43:51 20 A No. I was actually kind of annoyed because,
02:43:53 21 like I said, I was preoccupied. And I just felt like it
02:43:56 22 was targeted, and that I was -- basically being set up
02:44:00 23 to do something stupid.

02:44:01 24 Q Uh-huh. Okay.

02:44:05 25 And this MizzInformation thing -- we talked

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02:44:09 1 about that before, and then you were just commenting
02:44:11 2 here you don't like their features or something.

02:44:13 3 What is MizzInformation?

02:44:15 4 A It was a spin on me being accused of spreading
02:44:18 5 misinformation throughout the trial. It was a play on
02:44:22 6 misinformation. I made it M-I-Z-Z information.

02:44:27 7 Q Oh, okay.

02:44:28 8 A Yeah.

02:44:29 9 Q I thought you got that from your friend? No?

02:44:31 10 A Got what?

02:44:32 11 Q The TikTok with MizzInformation?

02:44:35 12 A Oh, no. That's what I changed the name to. I
02:44:38 13 got my TikTok from, Mike, yes. But I changed the name
02:44:41 14 to MizzInformation. That was the handle at the time.

02:44:43 15 Q All right. But the handle originated with
02:44:44 16 you?

02:44:45 17 A The MizzInformation handle?

02:44:47 18 Q Yeah.

02:44:47 19 A Yes.

02:44:48 20 Q Okay. And then when he gave you his TikTok,
02:44:50 21 you didn't keep the name? You changed the name?

02:44:53 22 A When he gave me the TikTok, I changed it to
02:44:55 23 MizzInformation from whatever he had. The other
02:44:59 24 MizzInformation page was my Instagram.

02:45:03 25 Q Okay. You say here, "And who would have been

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02:45:11 1 recording?"

02:45:11 2 What do you mean by that?

02:45:13 3 A In the video, it looked like Megan and the
02:45:18 4 other party were very close. Per the angle, I was
02:45:22 5 trying to figure out, like, what is this setup? So I
02:45:25 6 was, like, well, who would have been recording? I'm
02:45:27 7 just speaking, like, as I'm thinking, speaking out loud.

02:45:31 8 Q Right. And -- and you are saying that's
02:45:33 9 another reason this doesn't seem right; right?

02:45:37 10 Like, who would have been in that spot with
02:45:39 11 the camera?

02:45:40 12 A Not necessarily. Because, like I said, I
02:45:44 13 believe her to be a promiscuous person. So it wasn't
02:45:47 14 the fact that there couldn't have been someone else in
02:45:49 15 the room. It was just me literally asking, who would
02:45:51 16 have been recording? Like, what is this? What am I
02:45:53 17 looking at, basically?

02:45:55 18 Q Uh-huh. And -- okay.

02:46:10 19 MS. HAYRAPETIAN: Can we please pull the video
02:46:11 20 titled "44-A," and can we mark it as 51-A, and then the
02:46:17 21 transcript will be 51-B.

02:46:19 22 STENO TECH ASSISTANT: Yes. One moment,
02:46:19 23 please.

02:46:35 24 MR. O'SULLIVAN: Is that the old one?

02:46:39 25 MS. HAYRAPETIAN: Yes, that's the transcript.

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02:46:57 1 MR. O'SULLIVAN: Okay. We're ready for the
02:46:58 2 audio when you are.
02:47:00 3 (A video clip was played.)
02:47:39 4 (Exhibit 51-A was marked for identification.)
02:47:39 5 (Exhibit 51-B was marked for identification.)
02:47:39 6 BY MR. O'SULLIVAN:
02:47:39 7 Q Okay. I think that's the end.
02:47:41 8 Is that your voice that we heard on the audio
02:47:43 9 that is 51-A?
02:47:45 10 A Yes.
02:47:45 11 Q What -- what setting was that on? Where are
02:47:46 12 you speaking there?
02:47:47 13 A That was STATIONHEAD.
02:47:48 14 Q STATIONHEAD?
02:47:49 15 A Uh-huh.
02:47:50 16 Q And what -- explain for me what the
02:47:59 17 distinction is. You said I wouldn't put it on my page.
02:48:02 18 A Uh-huh.
02:48:02 19 Q But I'll put it on my Discord.
02:48:05 20 A Uh-huh.
02:48:05 21 Q We talked before about the copyright takedown
02:48:07 22 and stuff.
02:48:08 23 What's the difference in your mind?
02:48:09 24 A In my mind, Discord is private, and there are
02:48:12 25 different rooms that have different accesses to them; so

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02:48:14 1 you can make some rooms for -- you can cut them off. So
02:48:18 2 whoever you want in them, whoever you don't want in
02:48:21 3 them, you can set them up that way.

02:48:22 4 So I don't consider it social media because
02:48:24 5 it's very controlled, and it's not wide open to
02:48:26 6 everyone. And my Discord is locked; so I don't
02:48:29 7 personally consider it social media.

02:48:33 8 Q But real people look at what you post on
02:48:35 9 Discord; right?

02:48:36 10 A The community members, yes.

02:48:37 11 Q The community members, yes.

02:48:39 12 A Uh-huh.

02:48:39 13 Q And you want your community members to look at
02:48:44 14 what you post there; right?

02:48:46 15 A Yes, I do.

02:48:47 16 Q That's the point. All right.

02:48:54 17 MR. O'SULLIVAN: Do you guys want to take a
02:48:56 18 break? We'll take a five-minute break.

02:49:00 19 THE WITNESS: Okay.

02:49:00 20 MS. DIXON: Yes.

02:49:02 21 THE VIDEOGRAPHER: The time is 2:49. We're
02:49:04 22 going off the record.

02:49:06 23 (Recess was taken.)

03:04:43 24 THE VIDEOGRAPHER: The time is 3:04. We're
03:04:49 25 back on the record.

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03:04:52 1 MR. O'SULLIVAN: While we were off, I've
03:04:54 2 handed the witness what we've marked as Exhibit 52. A
03:04:57 3 one-page document. It says "MizzInformation" at the
03:05:00 4 top.
03:05:02 5 (Exhibit 52 was marked for identification.)
03:05:02 6 BY MR. O'SULLIVAN:
03:05:03 7 Q I'll ask you, Ms. Cooper, can you tell me what
03:05:05 8 this shows, this Exhibit 52?
03:05:07 9 A This shows a screenshot of my post that said,
03:05:10 10 "Go to my likes," and it says, "This post has been
03:05:13 11 deleted." It was a screenshot that was shared to the
03:05:15 12 Close Friends of the Instagram page.
03:05:17 13 Q All right. So we looked before at this tweet;
03:05:21 14 right?
03:05:22 15 A Uh-huh.
03:05:22 16 Q That said, "Go to my likes." Yeah?
03:05:24 17 A Uh-huh.
03:05:25 18 Q And you took a picture of it? Screenshot?
03:05:29 19 A Of the tweet, uh-huh.
03:05:31 20 Q Saying "Go to my likes," and then sent it
03:05:33 21 somewhere else not on Twitter?
03:05:34 22 A No. So what happened was, I did a show, the
03:05:38 23 next day, I believe, talking about the whole situation.
03:05:41 24 And, from my reference, I put this in my Close Friends
03:05:45 25 for me to go look at, like, while streaming live so I

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03:05:49 1 can reference it.

03:05:50 2 Q All right. So who -- who is the audience for
03:05:53 3 this Exhibit 52? Not the original tweet. This -- this
03:05:56 4 screenshot? Mizz --

03:05:57 5 A Right.

03:05:58 6 Q It's -- okay.

03:05:59 7 A Yeah. My Close Friends has me in it.

03:06:00 8 So I have two Instagram pages. I have Milagro
03:06:03 9 Gramz and my blog page. And so I am the only person in
03:06:08 10 the Close Friends on both pages, because I use my Close
03:06:10 11 Friends to post things that I'm going to want to talk
03:06:14 12 about on my show; so I'm the audience on both papers.

03:06:21 13 Q So, by doing this, you were sort of sending it
03:06:24 14 to yourself?

03:06:25 15 A Like, bookmarking it, so to speak.

03:06:28 16 Q And -- And where -- where -- is Close Friends
03:06:34 17 a category on social media?

03:06:36 18 A Yes. Close Friends is a category on Instagram
03:06:39 19 where you can add whom you wish to see private things.
03:06:43 20 It's not a public.

03:06:44 21 Q Got it. Okay. And you -- you have Close
03:06:46 22 Friends on Instagram?

03:06:50 23 A Every user has a option to use Close Friends.

03:06:52 24 Q Got it. And, in your case, did you exercise
03:06:54 25 that option to add people to your Close Friends?

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03:06:56 1 A I just added myself.

03:06:57 2 Q Right. The only person in there is you?

03:06:59 3 A Yeah.

03:07:00 4 Q And so you are saying you took a screenshot of

03:07:05 5 the "Go to my likes" tweet?

03:07:06 6 A Uh-huh.

03:07:07 7 Q And sent it to yourself?

03:07:08 8 A I posted it on the blog page, yes, in the post

03:07:10 9 Close Friends.

03:07:12 10 Q So when you did that, would anybody besides

03:07:17 11 you see it?

03:07:18 12 A No.

03:07:19 13 Q So you did send it to yourself, effectively.

03:07:21 14 Is there -- does anybody else have access to

03:07:26 15 this Close Friends --

03:07:27 16 A No.

03:07:28 17 Q -- on Instagram?

03:07:28 18 A No. So it's just literally -- you see the

03:07:31 19 bars at the top? It's like a story. So it only stays

03:07:34 20 up for a certain amount of time. So it literally is

03:07:37 21 just a post, and I'm the only one that can see it.

03:07:41 22 Q And what was the purpose of doing that?

03:07:43 23 A Because the next day, after everything

03:07:45 24 happened on the Internet on June 8th, I wanted to

03:07:48 25 discuss the situation; so I posted it to be able to

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03:07:51 1 reference it on my show.

03:07:54 2 Q And was it going to be there the next day or
03:07:56 3 it goes away?

03:07:56 4 A No. It goes away after 24 hours.

03:07:58 5 Q So how would that help you the next day? I
03:08:00 6 mean, were you afraid you were going to forget that you
03:08:03 7 tweeted "Go to my likes" the day before?

03:08:06 8 A No. It had been deleted. The post had been
03:08:08 9 deleted; so it didn't exist anymore. So the only way
03:08:11 10 they would see it is from a screenshot.

03:08:13 11 That's why I posted the screenshot. 'Cause
03:08:15 12 when I was talking about it, I could go back and show
03:08:17 13 them what I originally said.

03:08:18 14 Q Oh, I see.

03:08:19 15 A Yeah.

03:08:20 16 Q And did you do that?

03:08:20 17 A Yes.

03:08:21 18 Q And so when was that? The next day?

03:08:23 19 A I believe so.

03:08:24 20 Q All right. I got it.

03:08:26 21 A Okay.

03:08:29 22 Q So as part of talking about the video the next
03:08:32 23 day --

03:08:32 24 A The situation, more so, yeah.

03:08:34 25 Q All right. What -- what, in your mind, on

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03:08:37 1 June 8th, was the situation?

03:08:41 2 A The situation was just the idea that Megan was
03:08:45 3 tied to the tape, not necessarily if it was her or
03:08:47 4 focusing -- I'm sorry -- focusing on the tape itself.
03:08:50 5 It was more so the fact that this was a topic at all.

03:08:53 6 Q You get to just say, maybe she did, maybe she
03:08:55 7 didn't. I don't know, but let's talk about it.

03:08:59 8 A You speak about trending topics. I mean, like
03:09:02 9 I said --

03:09:03 10 Q Even if it's a flat-out lie, if it's trending,
03:09:05 11 we'll talk about it. I'll spread the lies because it's
03:09:08 12 trending.

03:09:08 13 A Well, it's not about spreading any narrative.
03:09:11 14 It's not about being here or there. It's just about the
03:09:13 15 fact that someone very -- someone of -- who has a lot of
03:09:18 16 notoriety is involved in something, and because of the
03:09:20 17 great interest in her, people want to discuss it.

03:09:23 18 Q But when you say "involved in something," you
03:09:26 19 include they actually did it -- or somebody completely
03:09:29 20 made it up and said they did it. For you those are two
03:09:32 21 things to talk about the same way; right? You don't
03:09:34 22 care if it really happened?

03:09:36 23 A That's not true. I -- the way that I --

03:09:37 24 Q You would still talk about it without knowing
03:09:39 25 that? You don't need to confirm it before you start

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03:09:42 1 talking about it?

03:09:43 2 A There are some instances where, depending upon
03:09:46 3 the situation, you may speak about it. Some things are
03:09:48 4 so outlandish that you don't. But because I believe
03:09:51 5 Megan to be promiscuous and -- I feel like it was very
03:09:56 6 possible it was her.

03:09:57 7 So, to me, when it was brought to my
03:09:59 8 attention, I felt like it was likely enough that it
03:10:02 9 could be her, that it was worth mentioning, that this is
03:10:05 10 a conversation online.

03:10:06 11 Q Likely enough. Okay.

03:10:07 12 Is that 50/50?

03:10:10 13 A I couldn't give you a percentage. But based
03:10:12 14 on her raps, and she has asserted that she loves sex,
03:10:15 15 and she's very sexual and stuff like that, I thought it
03:10:17 16 was possible that it could be her.

03:10:20 17 Q 'Cause everyone who thinks that way or is that
03:10:21 18 way puts their stuff out on the Internet?

03:10:24 19 A Like I said --

03:10:25 20 Q Their naked pictures.

03:10:26 21 A -- Megan to me is different because she's very
03:10:28 22 open and a lot of times is scantily clad and bending
03:10:33 23 over and twerking and doing a lot of suggestive things;
03:10:35 24 so, once again, it wasn't farfetched that it was
03:10:39 25 possible.

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03:10:40 1 Q You were willing to take the risk. That if it
03:10:41 2 was fake and it got out there, and you promoted it a
03:10:44 3 little bit, she's a celebrity. Tough.

03:10:46 4 A No. I do not feel as though I promoted it.
03:10:48 5 And, like I said, for me, my focus was more on the
03:10:51 6 situation itself, not the video.

03:10:53 7 Q Do you think you are in this category of
03:10:54 8 famous people where people should be free, if there's a
03:10:58 9 deepfake porn video of you, to say, hey, it could be
03:11:01 10 her? Pass it around. Go look at my -- go look at my
03:11:04 11 Discord. Let's have a discussion about whether she
03:11:08 12 really did it.

03:11:08 13 A I -- I, under no circumstances, liken myself
03:11:10 14 to a celebrity like Megan. She's leagues ahead of any
03:11:15 15 type of notoriety that I have.

03:11:16 16 Q But you think at a certain level of celebrity,
03:11:18 17 fake -- deepfake porn videos are just the cost of being
03:11:22 18 out there?

03:11:22 19 A Well, what I will say is, even at my level of
03:11:24 20 notoriety, there are a lot of conversations about me I
03:11:26 21 wish people wouldn't have but they do. Once you get
03:11:28 22 enough attention, it happens, unfortunately.

03:11:30 23 Q Okay. And you think that's just life, that
03:11:32 24 includes deepfake porn videos?

03:11:36 25 A I think that celebrity culture has a lot of

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03:11:38 1 different layers to it, and in its unfortunate what
03:11:41 2 people are interested in.

03:11:42 3 Q And are you contributing to the more negative
03:11:44 4 version of today's culture or a more positive version by
03:11:48 5 doing deepfake porns?

03:11:49 6 A I would say more positive.

03:11:51 7 Q You think it's positive to culture and our
03:11:53 8 national conversation to circulate deepfake porn videos?

03:11:56 9 MS. DIXON: Objection. Mischaracterizes the
03:11:59 10 phrase.

03:11:59 11 THE WITNESS: I do not feel as though I
03:12:00 12 promote it, any deepfake video. So, for me, once again,
03:12:02 13 it's about the topic.

03:12:03 14 So the way that I would navigate that
03:12:05 15 conversation is bring it up. And then I would discuss
03:12:07 16 why I think that's compromising, and why young women
03:12:10 17 maybe should not do things like that or maybe not get
03:12:13 18 themselves filmed.

03:12:13 19 I always try find a way to bring it back to
03:12:16 20 the community and have a talk about what is happening in
03:12:18 21 the culture.

03:12:19 22 BY MR. O'SULLIVAN:

03:12:19 23 Q Right. Okay.

03:12:21 24 Rough world for young women out there.

03:12:31 25 MS. HAYRAPETIAN: Could we please pull up the

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03:12:33 1 document, the audio titled "61-A," which we want to mark
03:12:38 2 as 53-A. And the transcript will be 53-B.
03:12:49 3 MR. O'SULLIVAN: So this is me, and this is
03:12:51 4 53-B.
03:12:52 5 MS. HAYRAPETIAN: Uh-huh.
03:13:23 6 STENO TECH ASSISTANT: All right. Ready to
03:13:24 7 share whenever you'd like.
03:13:25 8 (Exhibit 53-A was marked for identification.)
03:13:25 9 (Exhibit 53-B was marked for identification.)
03:13:25 10
03:13:25 11 BY MR. O'SULLIVAN:
03:13:25 12 Q Before we start that, I want to ask you,
03:13:28 13 Ms. Cooper, have you -- I know you said that -- that
03:13:30 14 even at your level celebrity you have to put up with
03:13:32 15 some things, have you ever been depicted in a fake video
03:13:37 16 in a sexual way? To your knowledge?
03:13:43 17 A I have -- not in a video.
03:13:45 18 Q Like, a still photo?
03:13:47 19 A So someone actually took photographs of me and
03:13:51 20 my children and put them on a Craigslist ad and
03:13:53 21 accused --
03:13:54 22 Q On a what?
03:13:55 23 A Craigslist.
03:13:56 24 Q Okay.
03:13:56 25 A And they said that I would perform sex acts

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03:14:00 1 for a price. And so I had to call the police and file
03:14:07 2 for solicitation of minors. So I've had a situation
03:14:11 3 that was unsavory, yes.

03:14:14 4 Q When was that?

03:14:19 5 A Maybe 2019-ish.

03:14:22 6 Q Okay. And somebody put a picture of you and
03:14:24 7 your children --

03:14:25 8 A Yes.

03:14:25 9 Q -- on Craigslist, and said you can have sex
03:14:28 10 with these people for a price?

03:14:29 11 A They said that I would perform sex acts in
03:14:31 12 front of my children for a set price, and they listed
03:14:33 13 other things -- services and put a price to it.

03:14:37 14 Q How did you find out about it?

03:14:40 15 A People brought it to my attention.

03:14:43 16 Q Okay. And you went to the police?

03:14:45 17 A Yes.

03:14:46 18 Q And what happened?

03:14:48 19 A I filed a police report.

03:14:49 20 Q Okay. Did you -- did you believe what was
03:14:51 21 going on there was criminal?

03:14:53 22 A Yes.

03:14:54 23 Q Why?

03:14:54 24 A For certain.

03:14:55 25 My children were in an ad dealing with things,

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03:14:58 1 something sexual.

03:14:59 2 Q Okay. And it wasn't true?

03:15:02 3 A No.

03:15:03 4 Q And what did the police do?

03:15:05 5 A They took the report. It's social media; so I
03:15:08 6 don't know if they went and got the guy. I don't know
03:15:12 7 what happened after the fact. I just know that I
03:15:13 8 reported it. I got a report number. A police officer
03:15:16 9 came out and all of that. I did what I could.

03:15:18 10 Q Uh-huh. And you never found out who did it?

03:15:25 11 A I know who did it, yes.

03:15:26 12 Q You know who did it?

03:15:27 13 A I gave the police their name.

03:15:29 14 Q Oh.

03:15:30 15 A Yeah. I went online and looked. And I
03:15:32 16 investigated, and I found out who it was.

03:15:34 17 Q And who was it?

03:15:37 18 A I only know his handle. His name was Brzy. I
03:15:39 19 don't know him personally.

03:15:40 20 Q Brzy, B-R-Z-Y?

03:15:43 21 A Yes.

03:15:44 22 Q And -- and as part of that, did you find out
03:15:49 23 anything more about Brzy?

03:15:53 24 A Brzy went to a blogger, and then -- this is
03:15:56 25 how I found out, by the public -- that person went to

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03:16:00 1 Tasha K., that we mentioned earlier, and left a comment
03:16:02 2 and said there's a YouTuber in a situation with her
03:16:06 3 kids, something of that nature, you follow up with me,
03:16:10 4 basically.

03:16:10 5 So I sent a message to the content creator in
03:16:13 6 an email, and I told her you should be mindful because I
03:16:18 7 will be pursuing -- you know, I'll follow up with the
03:16:20 8 police. This person is not being honest; so run that
03:16:23 9 story at your own risk, basically. Because if you do,
03:16:26 10 then you are asserting something that's not true, and
03:16:28 11 I'll do what I need to do necessary after that.

03:16:30 12 Q So you've been on the other side of this same
03:16:32 13 situation? People are talking about putting things out
03:16:35 14 there that you say is untrue?

03:16:36 15 A Right. Yeah, I have.

03:16:39 16 Q And -- and I didn't understand it.

03:16:40 17 Are you saying the person involved in the "sex
03:16:44 18 with -- in front of your kids" ad is the same person who
03:16:49 19 posted the Megan video? The Kahn guy?

03:16:53 20 A No, not at all.

03:16:54 21 Q Oh.

03:16:57 22 A Brzy. The person Brzy.

03:16:59 23 Q Yes. But didn't you tell me somebody else was
03:17:01 24 attached to it? No?

03:17:04 25 A To what are we talking about? We're talking

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03:17:05 1 about the situation with my children? Me and my
03:17:07 2 children?

03:17:07 3 Q Yes.

03:17:08 4 A That's only concerning Brzy.

03:17:10 5 Q Okay. And -- and that's -- that's an Internet
03:17:12 6 name of a person you don't know?

03:17:13 7 A Right.

03:17:15 8 Q Is there some other person involved in this?

03:17:18 9 A Not to my knowledge. It was just that person.

03:17:19 10 Q But who was -- you said somebody was going to
03:17:22 11 post it, and you said if you do that --

03:17:23 12 A Oh. A blogger named Tasha K.

03:17:25 13 Q All right. Why is that name familiar? Is
03:17:27 14 that the person that --

03:17:27 15 A It came up earlier about the Cardi B.
03:17:29 16 defamation case. She's the one that got sued for
03:17:32 17 defamation.

03:17:35 18 Q Okay. And she was going to post the video --
03:17:37 19 the Craigslist video -- or the Craigslist ad --

03:17:40 20 A I couldn't say. All I saw was that he reached
03:17:42 21 out to her publicly. I didn't see her -- she -- she
03:17:45 22 wrote back and said, "Email me," or something of that
03:17:49 23 nature, which to me signaled that she was interested.
03:17:52 24 So that's when I emailed her. And I said, "You don't
03:17:55 25 know what you are stepping into. And I will be, you

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03:17:58 1 know, going forward, with going to the police."

03:18:01 2 Something of that nature.

03:18:05 3 Q All right. And the "her," in what you just
03:18:07 4 testified, is Tasha K.?

03:18:09 5 A Uh-huh.

03:18:11 6 Q So somehow you became aware that she was in
03:18:14 7 touch with Brzy --

03:18:16 8 A Uh-huh.

03:18:16 9 Q -- about the video involving your family? Or
03:18:18 10 about the ad?

03:18:19 11 A About this ad.

03:18:20 12 Q The Craigslist ad?

03:18:21 13 A Yes.

03:18:22 14 Q And on social media you reached out to
03:18:23 15 Tasha K. and said, "It's fake"?

03:18:25 16 A Via email.

03:18:26 17 Q Via email?

03:18:27 18 A Uh-huh.

03:18:27 19 Q Did you say, "It's fake"?

03:18:31 20 A I don't know if I would have said, "It's
03:18:34 21 fake." But I definitely let her know that there's no
03:18:36 22 truth to this person's claims, and I will be moving
03:18:38 23 forward.

03:18:41 24 Q What does that mean? How did she interpret
03:18:43 25 that? What did you want her to take from that?

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03:18:45 1 A I wanted her to not platform that information.
03:18:48 2 Because, once again, this is stepping into territory
03:18:52 3 where this is solicitation of a minor, is what it was
03:18:54 4 looking like to me.

03:18:55 5 Because I had asked around, like, what I can
03:18:57 6 do 'cause I wanted to take action. And someone told me,
03:19:00 7 you know, that could be solicitation of a minor. So
03:19:02 8 that's when I reached out to the police.

03:19:03 9 And when they told me that, I told her,
03:19:04 10 "Listen, I will be moving forward; so, if you involve
03:19:08 11 yourself in this, understand I'm not going to just sit
03:19:09 12 by. I'm going to move forward."

03:19:12 13 Q But what does that mean, "move forward"?
03:19:14 14 Bring charges?

03:19:14 15 A That means going to the police and trying to
03:19:16 16 do whatever I can to stop this.

03:19:18 17 Q 'Cause it's painful for you and your family;
03:19:19 18 right?

03:19:20 19 A Children shouldn't be involved. It was just
03:19:21 20 ridiculous.

03:19:22 21 Q Even if it wasn't your children, it's a --
03:19:24 22 it's a fake sexual thing being put out there; right?
03:19:26 23 It's not true?

03:19:28 24 A Right, it's not true.

03:19:29 25 Q Lies about who you are that way. Yeah? It's

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03:19:31 1 a lie?

03:19:32 2 A Uh-huh.

03:19:33 3 Q And you were very bothered about by that.

03:19:34 4 Yeah?

03:19:35 5 A Is disgusted by it, of course.

03:19:36 6 Q You wanted to bring criminal charges, if you

03:19:38 7 could?

03:19:38 8 A Uh-huh.

03:19:39 9 Q And this Tasha K. -- did she post the ad?

03:19:42 10 A No, not to my knowledge.

03:19:43 11 Q How was she going to platform it?

03:19:45 12 A She has a YouTube page with over a million

03:19:49 13 subscribers at this point; so I expected her to do a

03:19:52 14 video on it.

03:19:56 15 Q You think she is going to put a video about

03:19:59 16 having sex in front of kids on YouTube?

03:20:00 17 A No. I think she was going to discuss the

03:20:02 18 situation.

03:20:02 19 Q She was going to say she was going to like it

03:20:03 20 on Twitter and send them to the likes?

03:20:06 21 A Quite possibly.

03:20:06 22 Q Like you did with the Megan video.

03:20:09 23 A Like I did with the post.

03:20:10 24 Because, once again, Tasha -- it doesn't

03:20:12 25 matter necessarily what happened or didn't. It's the

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03:20:15 1 fact that this person is involved in this; so I
03:20:17 2 definitely, at least, expected her to talk about it.

03:20:20 3 So that's why I reached out to her, 'cause I
03:20:22 4 felt like you would go and talk about this.

03:20:25 5 Q Because you thought she had the same rules as
03:20:26 6 you, which is it doesn't matter if it's true or false.
03:20:28 7 If it's famous, we get to talk about it and say who
03:20:32 8 knows?

03:20:33 9 MS. DIXON: Objection.

03:20:33 10 THE WITNESS: I think it's because --

03:20:34 11 I think it's because she understands what a
03:20:36 12 lot of us do in the business which is something happens
03:20:39 13 to a particular person, the audience wants to hear about
03:20:42 14 it, and so you discuss it. There's --

03:20:44 15 BY MR. O'SULLIVAN:

03:20:45 16 Q Okay.

03:20:45 17 A I'm sorry.

03:20:46 18 Q You think that's okay? The world should be
03:20:48 19 like that? It can be lie your ass off, talk as much as
03:20:51 20 you want. If they're famous and it's interesting, let's
03:20:53 21 throw it out there, repeat it, and let them deny it.

03:20:56 22 A No, I don't think that. I just think that we
03:20:59 23 are living in a world where celebrities have a lot of
03:21:01 24 influence over our communities; so it is important to
03:21:04 25 discuss what is happening.

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03:21:06 1 Q Even lies? Why should we discuss something
03:21:08 2 that never happened, 'cause some yahoo in the middle of
03:21:12 3 nowhere just made it up? Why does that make it relevant
03:21:15 4 because somebody put out a lie?

03:21:16 5 A Well, I don't get to determine what is
03:21:19 6 relevant, because the social media and what they make
03:21:21 7 trend determines what is relevant. But even if it
03:21:23 8 wasn't Megan in the video, like I stated in some of my
03:21:26 9 tweets, AI is a problem.

03:21:28 10 So, even if it wasn't about the video, then
03:21:30 11 she needs to sue whoever made the video. What -- the
03:21:33 12 person that put it online -- Bimbella itself promoted
03:21:35 13 it. They hosted it. The person that posted it on
03:21:37 14 Twitter with the actual link, they posted it.

03:21:38 15 So me saying, "Go to my likes," when you have
03:21:41 16 a website hosting it -- when you have the person, and
03:21:43 17 not even attempting to go after these people, is
03:21:46 18 interesting.

03:21:46 19 Q Did Tasha K. say that to you?

03:21:48 20 A No.

03:21:48 21 Q Did she say, "Why don't you go after the
03:21:50 22 person that made the Craigslist ad leave me alone"?

03:21:53 23 A No.

03:21:54 24 Q "I just want to talk about it."

03:21:55 25 Did they say that to you?

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03:21:56 1 A No.

03:21:57 2 Q That's would really be -- that's the same as
03:21:57 3 your position, though; right. I didn't make it. I'm
03:22:00 4 just going to talk about it?

03:22:01 5 A Right. And had she talked about it, then that
03:22:03 6 would have been her prerogative, and I would have had to
03:22:06 7 accept it, because I would have had some type of
03:22:08 8 notoriety. There's nothing we can do about that.

03:22:10 9 Q Has any lawyer ever told you that's the real
03:22:13 10 world? Like, that that's -- that's actually the law?

03:22:15 11 MS. DIXON: Objection. That assumes facts not
03:22:16 12 in --

03:22:16 13 MR. O'SULLIVAN: Why do you think that?

03:22:16 14 MS. DIXON: I mean, that's actually not true.
03:22:19 15 It's a mischaracterization -- mischaracterization of
03:22:20 16 law.

03:22:22 17 BY MR. O'SULLIVAN:

03:22:22 18 Q Why do you think that's okay? That you can
03:22:24 19 excuse stuff that -- at least on paper is illegal by
03:22:26 20 saying that's our culture?

03:22:28 21 A I don't. I'm not saying anything is okay.

03:22:30 22 All I'm telling you is that I feel like you
03:22:33 23 are focusing on the video itself and then trying to make
03:22:36 24 it a focal point in saying that that's what it's about.

03:22:39 25 Q I'm focusing on promoting the video.

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03:22:41 1 A Right.

03:22:41 2 Q If it just sat and nobody ever watched it,

03:22:42 3 that's one thing.

03:22:43 4 As the -- more people say, "Hey, look at this.

03:22:45 5 Go look at my thing," that has an immediate effect;

03:22:47 6 right? You don't unsee that; right?

03:22:51 7 A For me, that's not my focal point. My focal

03:22:53 8 point is a celebrity is tied to something and it

03:22:55 9 happened, let's discuss what is happening.

03:22:57 10 Q But it didn't happen, right, in this case?

03:22:59 11 A It did happen because the video was put out.

03:23:01 12 Regardless if --

03:23:02 13 Q Oh, I see. The underlying thing. But it's a

03:23:04 14 lie and it's fake, but it's out there.

03:23:07 15 A Once again, that's not my focal point. My

03:23:08 16 focal point is that --

03:23:10 17 Q Okay.

03:23:10 18 A -- it's attached to her name.

03:23:12 19 Q Okay. So I think the judge is going to decide

03:23:14 20 in this case whether that's okay.

03:23:15 21 MS. DIXON: Absolutely.

03:23:17 22 MR. O'SULLIVAN: Okay. What is next?

03:23:20 23 MS. HAYRAPETIAN: Can we play the clip?

03:23:21 24 MR. O'SULLIVAN: Yes.

03:23:28 25 (A video clip was played.)

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03:28:02 1 BY MR. O'SULLIVAN:

03:28:02 2 Q All right. On this -- page 4 of this -- well,
03:28:09 3 first of all, you just heard what -- what that audio
03:28:12 4 recording.

03:28:12 5 Was that you on the recording?

03:28:14 6 A Yes.

03:28:15 7 Q And this is 50- --

03:28:25 8 MS. HAYRAPETIAN: 3.

03:28:25 9 MR. O'SULLIVAN: This is 53.

03:28:26 10 BY MR. O'SULLIVAN:

03:28:27 11 Q Okay. That's you.

03:28:27 12 And you said everything that we heard there in
03:28:30 13 what platform? In what setting?

03:28:35 14 A I -- I believe that was YouTube.

03:28:37 15 Q Okay. And you are talking about the fact that
03:28:43 16 all these questions you asked were answered by a sworn
03:28:47 17 declaration that said the bullets are in evidence, the
03:28:49 18 casings are in evidence, the gun is in evidence; right?

03:28:53 19 You acknowledge that eventually?

03:28:55 20 A That some things were addressed, yes.

03:28:58 21 (The Court Reporter requested clarification.)

03:28:58 22 THE WITNESS: Addressed. I'm sorry.

03:28:58 23 BY MR. O'SULLIVAN:

03:28:59 24 Q Okay. Some things that you said -- there's no
03:29:03 25 bullets, and there's no casings, and there's no nothing,

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03:29:04 1 and then all of sudden the guy who's in charge of the
03:29:06 2 evidence locker says it's right here; yeah?

03:29:09 3 A Well, I think it's really important to note
03:29:11 4 that "TMZ," and other outlets and the courts, said that
03:29:14 5 the bullet fragments were missing, not me. I just
03:29:17 6 repeated what was posted.

03:29:18 7 Q Show me where the court said that.

03:29:20 8 A When I went to trial, they said the bullet
03:29:22 9 fragments were missing.

03:29:25 10 Q I think we talked earlier about the fact that
03:29:27 11 everybody in the courtroom saw the evidence; right?

03:29:30 12 Maybe you weren't there that day?

03:29:31 13 A I was there every day.

03:29:33 14 Q Okay. Did you see the X-ray?

03:29:34 15 A I saw an X-ray.

03:29:35 16 Q Did you see the testimony about metallic
03:29:37 17 fragments?

03:29:39 18 A Yes, I did see that testimony.

03:29:40 19 Q Okay. And who said something was missing?

03:29:44 20 A I don't recall exactly who said it, but I
03:29:46 21 recall it being said in court, that bullet fragments
03:29:48 22 were missing. And prior to that, from the preliminary
03:29:50 23 hearing -- actually, that's what it was. The
03:29:52 24 preliminary hearing. Detective Stogner said they were
03:29:55 25 missing, I believe.

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03:29:56 1 Q Okay. But they were at trial?

03:29:57 2 A No. They weren't.

03:29:58 3 MS. DIXON: No. Objection.

03:29:58 4 MR. O'SULLIVAN: Excuse me? You didn't

03:29:58 5 need --

03:30:00 6 MS. DIXON: The best evidence is the

03:30:01 7 transcript; so you should just --

03:30:03 8 MR. O'SULLIVAN: These are trial objections,

03:30:04 9 Counsel.

03:30:05 10 MS. DIXON: No.

03:30:05 11 But you should look --

03:30:07 12 MR. O'SULLIVAN: These are not deposition

03:30:08 13 objections.

03:30:09 14 MS. DIXON: She -- she can't tell you what was

03:30:10 15 at trial. The transcript says that. You are

03:30:11 16 mischaracterizing.

03:30:12 17 MR. O'SULLIVAN: Your objection is noted.

03:30:13 18 MS. DIXON: Okay. So you are

03:30:14 19 mischaracterizing what was said at trial, because the

03:30:16 20 transcript doesn't say what you are saying.

03:30:18 21 MR. O'SULLIVAN: Your objection is noted.

03:30:19 22 MS. DIXON: Thank you.

03:30:20 23 BY MR. O'SULLIVAN:

03:30:20 24 Q Okay. In what we just listened to, you said,

03:30:22 25 "Something's changed. I've now seen"; right? Under

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03:30:26 1 penalty of perjury, the person who has personal
03:30:29 2 knowledge, saying the stuff is all in her possession;
03:30:32 3 right? You acknowledge that?

03:30:33 4 A Yes.

03:30:34 5 Q And you said, "Had I seen that before, I
03:30:35 6 wouldn't have said what I said"; right?

03:30:37 7 A If I had seen that before, I would have
03:30:38 8 reported on that, because the preliminary transcript
03:30:41 9 existed so that happened. So it was stated that bullet
03:30:44 10 fragments were missing.

03:30:45 11 Q All right. So you are saying you can say --
03:30:47 12 make your own interpretation as truth until somebody
03:30:50 13 officially denies it to you.

03:30:51 14 A No. What I'm saying is Detective Stogner
03:30:54 15 testified under oath that bullet fragments were missing.
03:30:58 16 It was widely reported by every major outlet in media.
03:31:01 17 I reported on it after the fact. And nothing
03:31:03 18 contradicted that there was never an assertion until
03:31:07 19 this.

03:31:08 20 Q But this was just made to -- to contradict
03:31:11 21 your false reporting; right? That's the whole point of
03:31:13 22 this.

03:31:14 23 MS. DIXON: Objection. Mischaracterizes the
03:31:16 24 witness.

03:31:16 25 THE WITNESS: I couldn't say that. Because

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03:31:17 1 once again, many people were repeating, saying --

03:31:20 2 following the trial, many people were -- reported on

03:31:23 3 this; so I wasn't --

03:31:24 4 BY MR. O'SULLIVAN:

03:31:24 5 Q And some person lies, and then everyone says,
03:31:26 6 oh, the other person lied too, and we can all lie.

03:31:28 7 Is that what the rule is? No?

03:31:30 8 A No. But I would hope that Detective Stogner
03:31:32 9 didn't lie on the stand.

03:31:33 10 Q Well, the jury believed him; right?

03:31:35 11 A He did not go to the trial, actually.

03:31:37 12 Q The jury believed the evidence.

03:31:38 13 Let me ask you a question.

03:31:39 14 A Uh-huh.

03:31:41 15 Q Do you think Megan -- no.

03:31:42 16 Do you believe -- are you saying that Megan
03:31:45 17 lied about being shot?

03:31:46 18 A I'm saying I don't know --

03:31:47 19 Q Yes or no?

03:31:47 20 A -- what happened to her.

03:31:49 21 Q All right. You don't know either way?

03:31:50 22 A No, I don't know.

03:31:51 23 Q Okay. So, if you were telling people that she
03:31:54 24 lied when she said she was shot, you don't have a basis
03:31:56 25 for that? A factual basis?

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03:31:58 1 A If I told people that I think she's lying, I
03:32:00 2 don't know what happened, I think there's been enough
03:32:02 3 contradictory things presented to say maybe.
03:32:06 4 Q I'm just saying if a jury hears all the
03:32:09 5 evidence; right?
03:32:09 6 A Uh-huh.
03:32:10 7 Q Under the rules, with a court, and concludes
03:32:12 8 that she was shot by Tory, what do you have on the other
03:32:16 9 side, besides questions, to say she's lying?
03:32:19 10 MS. DIXON: Objection. It's a compound
03:32:20 11 question.
03:32:21 12 THE WITNESS: Well, at the end of the day --
03:32:24 13 BY MR. O'SULLIVAN:
03:32:24 14 Q Questions are not evidence?
03:32:25 15 A -- juries are not perfect. And I think that
03:32:27 16 evidence of that is The Central Park Five, and the
03:32:30 17 thousands of Black men that have been released after a
03:32:32 18 court found they were not guilty of a crime; so I
03:32:34 19 understand that the jury reached a verdict. And I
03:32:36 20 respect it, but I do not agree with it.
03:32:39 21 And I feel like I have enough reasons to say,
03:32:41 22 hey, I don't think this is right. It should be looked
03:32:43 23 at again.
03:32:45 24 Q As an opinion?
03:32:46 25 A As an opinion. Yes.

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03:32:47 1 Q Not as a fact?

03:32:48 2 A No, never as a fact.

03:32:50 3 Q Okay. Here you say, "Actually, I'm going to

03:32:56 4 have to get off my phone. There's something that I want

03:32:58 5 to say, but I can't say it; so meet me on Discord."

03:33:00 6 Do you remember what you talked about on

03:33:01 7 Discord?

03:33:05 8 A I don't.

03:33:06 9 Q What would be something you would leave

03:33:07 10 YouTube and go to Discord for?

03:33:09 11 A When I'm speaking about Tory's case, people

03:33:13 12 have their own ideas of things; so I didn't want them to

03:33:16 13 make my words his. So I didn't want to do that

03:33:19 14 publicly. I wanted to do it in a more private space.

03:33:22 15 So sometimes I would -- maybe an extension of

03:33:24 16 this conversation -- and go and give my opinions. Or

03:33:26 17 talk with the public and see what they thought, bounce

03:33:29 18 ideas. Anything like that.

03:33:31 19 Q And why would it be that that's okay to say on

03:33:35 20 Discord but not on YouTube?

03:33:37 21 A Because as someone who is the person giving

03:33:39 22 commentary, people are listening. They may take this or

03:33:42 23 that and -- and make it a thing. So if you don't want

03:33:44 24 to add to it, that's not your goal, then don't even put

03:33:46 25 it out there for consumption, basically.

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03:33:48 1 So I --

03:33:50 2 Q What's an example of something you would be
03:33:52 3 comfortable saying to a smaller group but not to all
03:33:54 4 your followers?

03:33:55 5 A So, in this instance, I personally felt that
03:33:58 6 it was really convenient that all of a sudden this was
03:34:00 7 asserted. So I might go online and say, "What do y'all
03:34:03 8 think about it?" I don't want it to be a public thing,
03:34:05 9 to make it look like I'm trying to combat it because
03:34:08 10 I've acknowledged it here, but I did want to discuss it
03:34:10 11 some more and see what people thought; so we just went
03:34:12 12 on Discord to talk about it.

03:34:14 13 Q All right. So you got evidence that the
03:34:15 14 evidence was really there, and you publically said,
03:34:16 15 well, I have to acknowledge this; so let's go on another
03:34:19 16 channel, and I'm going to try undermine and say maybe
03:34:22 17 it's not true, why is it so -- like, create doubt;
03:34:24 18 right?

03:34:25 19 A No. Discord is, like I said, a community
03:34:28 20 space; and I'm not, quote/unquote, "on," I'm not
03:34:28 21 performing when I'm getting on Discord; so it's more for
03:34:31 22 me to be able to just talk more, like, regularly.

03:34:38 23 Q I still don't understand, in this setting,
03:34:39 24 about the Tory case and about the evidence what you are
03:34:41 25 talking about. What could you say on Discord?

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03:34:42 1 You saying you don't remember what you said;
03:34:45 2 right?

03:34:45 3 A I don't remember. But my point is that when
03:34:47 4 I'm streaming live, anything I say can be taken by the
03:34:50 5 public and then, oh, she said this, she said that. If I
03:34:53 6 don't even want that, don't give it to them.

03:34:55 7 So I just wanted to talk with the community.
03:34:57 8 Like I said, it's a community space. I want to know
03:35:00 9 what they think too. I don't believe that STATIONHEAD
03:35:01 10 is a place for that; so I took it to Discord.

03:35:06 11 Q All right. And -- and reading the last
03:35:18 12 paragraph, and it's saying, "You better shut your mouth"
03:35:20 13 and "Shut up, are you crazy?"

03:35:22 14 Does that give you any clue as to what you
03:35:24 15 were going to bring up on the Discord that you couldn't
03:35:27 16 bring up on YouTube?

03:35:28 17 A No. I just think it's me just saying out loud
03:35:31 18 like, just, move on. Like, don't -- not in this space.
03:35:34 19 Like, don't sit on here and give it there -- like, give
03:35:38 20 topics there.

03:35:39 21 Q It sounds like you are encouraging them, this
03:35:40 22 is going to be really juicy, come listen on Discord;
03:35:43 23 right?

03:35:44 24 A No. It's like your friends; it's like -- it's
03:35:45 25 like peers; it's a chat room; so, hey, let's go

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03:35:49 1 chitchat.

03:35:50 2 Q Uh-huh. Okay.

03:36:17 3 MR. O'SULLIVAN: 54.

03:36:18 4 Okay. Here you go, Counsel.

03:36:22 5 For the record I've marked as Exhibit 54 a

03:36:26 6 one-page document. It appears to be a post from Milagro

03:36:31 7 MobzWorld.

03:36:32 8 (Exhibit 54 was marked for identification.)

03:36:33 9 BY MR. O'SULLIVAN:

03:36:34 10 Q Ms. Cooper, do you recognize what I've marked
03:36:37 11 as Exhibit 54?

03:36:38 12 A Yes, I do.

03:36:39 13 Q Is that a post by you?

03:36:41 14 A Yes.

03:36:42 15 Q Okay. First line, read that.

03:36:47 16 A It says, "Was Megan Thee Stallion caught
03:36:49 17 trying to deceive the courts again? The answer is yes
03:36:53 18 if you ask her former cameraman Emilio Garcia."

03:36:57 19 Q Okay. And sticking with the first sentence
03:36:58 20 again.

03:36:59 21 A Uh-huh.

03:37:00 22 Q What are you saying was -- was Megan's
03:37:03 23 deception of a court the first time? She's doing
03:37:06 24 something again. How did she deceive the court the
03:37:09 25 first time.

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03:37:09 1 Or does it relate to the Tory case?

03:37:11 2 A So, for me -- so, for me, I said courts with
03:37:14 3 an S. For me, the court and the courts, that's a
03:37:18 4 system. So when I say "the courts," you have the
03:37:21 5 courthouse; you have the people there; you have the
03:37:22 6 police department; you have everybody working in tandem.
03:37:25 7 So when I'm saying was she trying to deceive the courts
03:37:27 8 again, Megan lied to many people leading up to --

03:37:31 9 Q I get it. But just to go -- literally what
03:37:33 10 you said.

03:37:34 11 A That's what I meant.

03:37:34 12 Q Okay. I just want to dig -- are you saying --
03:37:36 13 put aside your definition of courts to include the whole
03:37:39 14 world.

03:37:39 15 The court itself -- are you saying there was a
03:37:41 16 prior occasion where Megan deceived the court, an actual
03:37:44 17 court?

03:37:45 18 A No.

03:37:45 19 Q All right. So you want people to interpret
03:37:47 20 this to mean if she's ever told a white lie or any lie
03:37:50 21 or anything in her life, that's deceiving the court?
03:37:54 22 Are you counting that?

03:37:55 23 A No. I was just basically asking if -- based
03:38:00 24 on the fact she's lied before to people in position,
03:38:02 25 authority --

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03:38:03 1 Q You said, "courts," that's under oath.
03:38:05 2 That's different.
03:38:06 3 A Right.
03:38:06 4 Q That's a crime.
03:38:07 5 A Well, for me, when I said, "courts," I meant
03:38:09 6 the system. I do feel like everyone works together in a
03:38:12 7 way -- the police department, the actual court lawyers.
03:38:15 8 Q Why didn't you say what you were referring to?
03:38:17 9 A I did.
03:38:19 10 Q You said, "courts."
03:38:20 11 A That's what I meant.
03:38:21 12 Q Lying to a court, deceiving a court is a
03:38:23 13 crime. You are accusing her of a crime. That has
03:38:25 14 bigger consequences in a case like this than saying she
03:38:28 15 lied in an interview about her sex life. Those are two
03:38:31 16 different things.
03:38:32 17 You get that; right?
03:38:33 18 A That's why I said, "courts" and not the court.
03:38:35 19 Because if I was speaking directly to -- had she
03:38:38 20 deceived the court, then that would have been specific.
03:38:40 21 For me, she's been deceptive to everyone in
03:38:42 22 the process of -- leading up to everything. I feel
03:38:45 23 like --
03:38:46 24 Q Everywhere but the court maybe, is what you
03:38:48 25 should have said?

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03:38:49 1 A I don't know that. I said the courts.

03:38:51 2 Q You're not -- even sitting here today, you

03:38:52 3 can't say she deceived a court; right? She didn't lie

03:38:55 4 under oath.

03:38:55 5 You just told me you can't say that; right?

03:38:57 6 A I cannot assert that.

03:38:59 7 Q Okay.

03:39:07 8 MR. O'SULLIVAN: What is next?

03:39:08 9 It doesn't matter. It doesn't matter. It's

03:39:41 10 fine. 55.

03:39:59 11 (Exhibit 55 was marked for identification.)

03:39:59 12 BY MR. O'SULLIVAN:

03:39:59 13 Q Okay. Ms. Cooper, you testified earlier that

03:40:02 14 you did attend the Tory Lanez shooting trial; right?

03:40:06 15 A Yes.

03:40:06 16 Q And you went every day?

03:40:07 17 A Yes.

03:40:08 18 Q Okay. And how long was the trial?

03:40:12 19 A I believe it was about two weeks.

03:40:14 20 Q Okay. And you mentioned that you had an

03:40:16 21 exchange with Tory himself on the first day? Yeah?

03:40:22 22 A Uh-huh.

03:40:22 23 Q He said, "They're going to make me a monster,"

03:40:25 24 and you said "No."

03:40:26 25 A No.

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03:40:27 1 Q I'm sorry. What did you say back to them?

03:40:28 2 "No they won't"?

03:40:29 3 A Something to that effect.

03:40:30 4 Q Okay. And did you have any -- other than
03:40:36 5 saying "Hello" and "Goodbye," did you have any exchanges
03:40:38 6 with Tory himself during the trial? You were in there
03:40:44 7 every day; right?

03:40:44 8 A I was in the courtroom with media. No. I
03:40:47 9 don't believe so.

03:40:51 10 Q Okay. And you took notes?

03:40:57 11 A Yes.

03:40:59 12 Q And are you generally a big notetaker?

03:41:02 13 A Yes.

03:41:03 14 Q Okay. And -- and we have the -- the notebook.
03:41:06 15 What is -- is this like a journal or
03:41:08 16 something? What was the physical thing you were using?

03:41:11 17 A Journals, yes.

03:41:11 18 Q Okay. And you were just sitting in there with
03:41:13 19 your hand, just writing notes as you go?

03:41:15 20 A Yes.

03:41:15 21 Q Okay. What are other things that you take
03:41:18 22 notes about? Like, do you have many of these journals,
03:41:23 23 from over the years, of different things that you've --

03:41:25 24 A Not in this way, because this was the first
03:41:27 25 time that I went to a trial.

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03:41:29 1 Q An actual trial.

03:41:30 2 A And sat through. And we couldn't have
03:41:32 3 electronics; so my only option was -- if I wanted to be
03:41:35 4 able to speak to it, I had to take notes. So that's why
03:41:38 5 I did it in this instance.

03:41:40 6 Q Got it. And any special approach you had when
03:41:45 7 doing this, or you just wrote down what you were
03:41:47 8 observing as you went?

03:41:48 9 A No. I -- I sat there, and it was listening
03:41:50 10 and just writing.

03:41:51 11 Q Okay. So I'm going to see -- this does have
03:41:56 12 a -- if you flip to -- sorry. It's really small. But
03:41:59 13 on the bottom, there's these -- it says Cooper and some
03:42:02 14 numbers, and I want you to go to the page that starts --
03:42:04 15 that ends 665.

03:42:20 16 A Uh-huh. Okay.

03:42:21 17 Q All right. And if you look on the left-facing
03:42:23 18 page, you see it says "Day 4, 10:40" at the top?

03:42:27 19 A Yes.

03:42:29 20 Q Okay. And then towards the bottom of that
03:42:35 21 page, you see it says, "Dr. Herano, 10:45"?

03:42:38 22 A Uh-huh.

03:42:39 23 Q 2018, Cedars-Sinai?

03:42:42 24 A Uh-huh.

03:42:42 25 Q Ortho foot doctor. Yeah?

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03:42:44 1 A Yes.

03:42:46 2 THE VIDEOGRAPHER: Counsel, can you please

03:42:47 3 watch the mic. Thank you.

03:42:52 4 BY MR. O'SULLIVAN:

03:42:53 5 Q And you were there and paying attention during

03:42:54 6 the doctor's testimony; right?

03:42:56 7 A Yes.

03:42:57 8 Q And he was talking about his examination and

03:42:59 9 treatment of her foot. Yeah? Of Megan's foot.

03:43:05 10 A I believe that he was -- he wasn't the actual

03:43:07 11 doctor that -- he was described as someone who was

03:43:10 12 there, but not like the main guy.

03:43:12 13 Q But he was found by the court to be competent

03:43:14 14 to give evidence about that?

03:43:16 15 A Yeah. I suppose, yeah.

03:43:17 16 Q Using the rules we do about what is reliable,

03:43:19 17 he was allowed to address that. Yes?

03:43:22 18 A Yes.

03:43:22 19 Q Okay. And there were X-ray images; right?

03:43:24 20 A Uh-huh.

03:43:25 21 Q You wrote down, "Left foot metallic foreign

03:43:29 22 bodies on heel bone." Yeah?

03:43:31 23 A Uh-huh.

03:43:31 24 Q Not glass. Metallic. Yeah?

03:43:35 25 A Yes.

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03:43:35 1 Q Okay. Below that, it says, "One foot, four
03:43:41 2 metallic bodies."
03:43:42 3 Do you see that?
03:43:43 4 A Yes.
03:43:43 5 Q And you heard that testimony; right?
03:43:45 6 A Yes.
03:43:46 7 Q Okay. Did anybody suggest, when the doctor
03:43:56 8 was testifying and you were there, that her injuries
03:44:00 9 were caused by glass and not bullet fragments? Somebody
03:44:07 10 assert that?
03:44:08 11 A I don't believe so.
03:44:09 12 Q Yeah. And the doctor didn't say that?
03:44:11 13 A Not that doctor.
03:44:12 14 Q Okay. And the -- did anybody testify at trial
03:44:23 15 that the metallic foreign bodies weren't bullet
03:44:27 16 fragments?
03:44:27 17 A No.
03:44:28 18 Q So the only evidence at trial was in her foot
03:44:30 19 were bullet fragments. Yeah? That was the evidence at
03:44:33 20 trial?
03:44:34 21 A What was presented at trial was an X-ray. But
03:44:37 22 in court, you know, reasonable doubt is something that
03:44:41 23 you should consider. And because of the pre-existing
03:44:42 24 medical report where it claims she was treated for
03:44:45 25 glass, and because it was stated that the bullet

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03:44:47 1 fragments were missing, I felt like it was still
03:44:49 2 questionable.

03:44:50 3 Q But reasonable doubt is not the same as truth;
03:44:52 4 right? It's the opposite. The jury, based on the
03:44:55 5 evidence that they were bullet fragments, concluded they
03:44:57 6 were bullet fragments, and that Tory shot Megan; right.
03:45:01 7 That was the conclusion of the case?

03:45:03 8 A I'm an independent thinker; so I understand
03:45:05 9 what the jury said. But when you have a medical report
03:45:08 10 saying that someone was treated for glass, medical
03:45:09 11 professionals that showed up to the scene and said that
03:45:11 12 was glass.

03:45:13 13 Q At the crime scene?

03:45:14 14 A At the crime scene.

03:45:15 15 Q Yeah. But later when everyone looked at
03:45:16 16 everything and they analyzed whether it was glass or
03:45:19 17 metal, they concluded and testified in the case that it
03:45:22 18 was metal. That's what was there in the hospital with
03:45:24 19 the patient in her foot. Yeah?

03:45:26 20 A Well, we also saw video where a glass bottle
03:45:29 21 fell out of the vehicle. It's very possible she stepped
03:45:31 22 on it.

03:45:32 23 Q But it wasn't in the examination room with the
03:45:32 24 patient inside of her foot; right? That was bullet
03:45:37 25 fragments. That's all you heard from the evidence.

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03:45:39 1 A Well, a doctor did report that he treated her
03:45:41 2 for glass fragments.

03:45:43 3 Q Okay. And that doctor?

03:45:45 4 A Uh-huh.

03:45:46 5 Q What did he say about the bullet fragments?

03:45:50 6 A That doctor said --

03:45:51 7 Q The one you are quoting.

03:45:52 8 A Nothing that I'm aware of.

03:45:54 9 Q Okay. And so the jury accredited this
03:45:57 10 evidence, but you didn't about the bullet fragments?

03:46:00 11 You still thought, "I have reasonable doubt, I can go
03:46:03 12 out into the world and sow that"?

03:46:05 13 A I can't say what the jury thought about, but I
03:46:08 14 know for me, like I said, they showed us an X-ray; but
03:46:12 15 since they could not produce the bullet fragments to us,
03:46:15 16 I felt like it was a reasonable to ask if it even
03:46:17 17 happened.

03:46:19 18 Q If it even happened?

03:46:21 19 A Yes. If you don't have the bullet fragments
03:46:23 20 to prove that that's what it was that you pulled out of
03:46:25 21 her feet, then I do feel like it's fair to ask.

03:46:28 22 Q Okay. And even fair to say out in public it
03:46:34 23 was glass and not a bullet?

03:46:36 24 A Well, I think it's fair to acknowledge what a
03:46:39 25 doctor said -- that it was a superficial wound, and that

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03:46:42 1 he treated her for glass. And also Megan said she
03:46:45 2 stepped on glass, and a glass bottle fell out of the car
03:46:47 3 and she stepped on it.

03:46:49 4 Q I get all that, that that happened the day of.
03:46:51 5 And then when she was treated with lights and all the
03:46:53 6 medical equipment and everything, the doctor made a
03:46:55 7 conclusive statement about what was there; right? It's
03:46:57 8 not hard to -- to tell the difference between glass and
03:47:01 9 a bullet fragment; right?

03:47:03 10 MS. DIXON: Objection. That calls for an
03:47:04 11 expert opinion.

03:47:05 12 THE WITNESS: Well, to me --

03:47:06 13 BY MR. O'SULLIVAN:

03:47:07 14 Q Anyway. You chose to not credit the testimony
03:47:09 15 of the doctor who said, "These are bullet fragments"?
03:47:11 16 You chose not to credit that?

03:47:12 17 A I did credit it because I reported it.

03:47:14 18 Q Okay. Okay. Is there anything -- strike
03:47:39 19 that.

03:47:49 20 MR. O'SULLIVAN: I need to speed up here.
03:47:54 21 I'll just do one of these. 58, please.

03:47:56 22 THE COURT REPORTER: 56.

03:47:56 23 MR. O'SULLIVAN: I'm sorry. 56.

03:48:22 24 MS. DIXON: I'm going to object to this for
03:48:24 25 lack of foundation and --

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03:48:25 1 MR. O'SULLIVAN: Okay. Counsel, I know that
03:48:25 2 maybe -- maybe you don't do this every day, but this is
03:48:27 3 not an appropriate objection. It's a civil deposition.
03:48:30 4 MS. DIXON: I understand.
03:48:31 5 MR. O'SULLIVAN: You can raise it at trial.
03:48:32 6 MS. DIXON: You can bring -- you can do them
03:48:33 7 just to preserve it. It doesn't mean she can't answer
03:48:36 8 it. But, obviously, she doesn't know how to read an
03:48:38 9 X-ray; so I'm just objecting on it.
03:48:40 10 MR. O'SULLIVAN: You don't even know what I'm
03:48:41 11 going to ask her, Counsel. Anyway, you are talking
03:48:43 12 about --
03:48:43 13 MS. DIXON: If you're going to show her an
03:48:44 14 X-ray, she's not qualified to read an X-ray.
03:48:47 15 MR. O'SULLIVAN: Okay, okay. Thank you for
03:48:48 16 that.
03:48:49 17 MS. DIXON: It's my objection.
03:48:50 18 MR. O'SULLIVAN: It's noted.
03:48:50 19 For the record, I've marked Exhibit 56 which
03:49:00 20 is an X-ray.
03:49:01 21 (Exhibit 56 was marked for identification.)
03:49:01 22 BY MR. O'SULLIVAN:
03:49:01 23 Q And I will ask you, Ms. Cooper, that you
03:49:06 24 attended the trial. Is the X-rays that you saw at the
03:49:11 25 trial -- strike that.

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03:49:18 1 Look at the images in Exhibit 56. Have you
03:49:21 2 looked at all the pages?
03:49:22 3 A Yes.
03:49:22 4 Q And you see the sticker at the end, Admitted
03:49:24 5 Into Evidence?
03:49:25 6 A Yes.
03:49:26 7 Q Okay. And you see, on the first page of
03:49:31 8 Exhibit 56, there appears to be some object that was
03:49:35 9 described in your presence as metal on her heel. Yeah?
03:49:39 10 A Uh-huh.
03:49:39 11 Q Okay. Is -- is it your belief that that's
03:49:44 12 glass?
03:49:45 13 A I believe it's possible.
03:49:46 14 Q You think it's possible that this item that
03:49:48 15 the doctor analyzed and said is metal was glass?
03:49:51 16 A I believe that because they were in the car --
03:49:55 17 "TMZ" reported that there was glass in the car. And I
03:49:58 18 believe that there are metallic fragments in tinted
03:50:02 19 windows; so I do think it's possible it could be glass
03:50:04 20 but from a window. Maybe not a bottle of glass, but a
03:50:08 21 tinted window possibly.
03:50:09 22 Q But the fact that the person actually took out
03:50:11 23 the item, tested it, and said it's a bullet fragment,
03:50:13 24 you still think it's glass?
03:50:16 25 MS. DIXON: Objection. Speculation.

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03:50:17 1 THE WITNESS: Well, the reason why I question
03:50:18 2 it is because they couldn't produce the bullet
03:50:21 3 fragments.

03:50:21 4 BY MR. O'SULLIVAN:

03:50:22 5 Q Okay. For you?

03:50:23 6 MS. DIXON: Objection. Just for clarity, the
03:50:24 7 doctor that you are talking about is not the one that
03:50:26 8 took it out. That's what we said before.

03:50:28 9 MR. O'SULLIVAN: I understand. I understand.

03:50:29 10 BY MR. O'SULLIVAN:

03:50:30 11 Q But you believe that whatever everyone else
03:50:32 12 concluded even today, could be she stepped on glass and
03:50:37 13 wasn't shot?

03:50:38 14 A Who is everyone else?

03:50:39 15 Q You are putting that out there even today;
03:50:41 16 right?

03:50:41 17 A What?

03:50:41 18 Q Are you still saying that Megan's injuries
03:50:44 19 were caused by stepping on glass?

03:50:46 20 A What I'm saying is I don't know what happened,
03:50:47 21 and I think that it should be re-evaluated.

03:50:49 22 Q You don't know what happened, but you have
03:50:50 23 said a lot about what happened; right?

03:50:51 24 A I've said a lot about the evidence that's been
03:50:53 25 presented and her contradictory statements.

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03:50:56 1 Q Okay.

03:51:02 2 MR. O'SULLIVAN: This is going to be 57.

03:51:20 3 (Exhibit 57 was marked for identification.)

03:51:21 4 BY MR. O'SULLIVAN:

03:51:26 5 Q Okay. I've marked as Exhibit 57, a three-page

03:51:32 6 document. It's got an Admitted in Evidence sticker on

03:51:35 7 the last page, and I'll ask you to look at all three

03:51:37 8 pages.

03:51:41 9 A Uh-huh. Okay.

03:51:42 10 Q Okay. Were you paying attention in court the

03:51:43 11 day that this report was presented into evidence?

03:51:47 12 A Yes.

03:51:47 13 Q Okay. And do me a favor, what is the

03:51:53 14 preoperative diagnosis?

03:51:56 15 A Gunshot wound, bilateral lower extremities.

03:51:58 16 Q And about what is the postoperative diagnosis?

03:52:01 17 A It says, "Same."

03:52:02 18 Q And -- and you heard that evidence. Yeah?

03:52:05 19 A Yes.

03:52:05 20 Q Okay. Go down to intraoperative findings.

03:52:14 21 What is the first intraoperative finding?

03:52:17 22 A Three major bullet fragments.

03:52:19 23 Q Okay. And then go down to the next section

03:52:23 24 and it says, "Specimens."

03:52:25 25 Do you see that?

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03:52:26 1 A Uh-huh.

03:52:27 2 Q What does it say there?

03:52:28 3 A It says, "Bullet fragment time three. Two
03:52:31 4 from left, one from right."

03:52:32 5 Q Okay. And did you see something there to make
03:52:37 6 you think that the people who put this in were lying?

03:52:41 7 A I --

03:52:43 8 Q Yes or no?

03:52:43 9 A I saw something here that made me question it.

03:52:46 10 Q Did you see -- have anything that made you
03:52:48 11 think they were lying, that somebody actually falsified
03:52:50 12 a medical record and put it into evidence under oath?

03:52:52 13 A Yeah. I thought that the 5 milliliters of
03:52:55 14 blood was really low, considering what the injury was
03:52:58 15 supposed to be.

03:52:59 16 Q Okay. Anything about the bullet fragments
03:53:02 17 that you thought was a lie? That you had a basis to
03:53:06 18 call a lie?

03:53:07 19 A I questioned this --

03:53:08 20 Q Not question. Did you have a basis, an
03:53:10 21 affirmative basement to call it a lie? That's a factual
03:53:12 22 thing, not questions.

03:53:13 23 A Right. There was a contradictory medical
03:53:16 24 report; so I was curious as to which one I should
03:53:18 25 believe. One report said she was treated for glass

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03:53:21 1 frag -- a glass wound; so I didn't know what to believe
03:53:24 2 at this point.

03:53:25 3 Q She wasn't -- that report is not in evidence;
03:53:26 4 right?

03:53:27 5 A It was not in evidence, but it was never
03:53:29 6 refuted.

03:53:30 7 Q Why -- why are things kept out of evidence,
03:53:32 8 usually?

03:53:32 9 A I couldn't answer that.

03:53:34 10 MS. DIXON: Objection. Speculation.

03:53:35 11 MR. MCLYMONT: Objection to form.

03:53:36 12 BY MR. O'SULLIVAN:

03:53:37 13 Q Okay. Maybe because it's unreliable?

03:53:39 14 A I couldn't say.

03:53:40 15 Q Wouldn't you want to know that when you were
03:53:42 16 out in public, saying things about what really happened?
03:53:43 17 Wouldn't you want to know if the thing that you're
03:53:47 18 relying on has been excluded because it's not reliable?
03:53:49 19 It doesn't meet the reliability necessary to be true.

03:53:52 20 A I think that we have come to find that there
03:53:55 21 are a lot of interest in things taking place with people
03:53:58 22 associated with this person.

03:54:01 23 Q It's a pretty general statement.

03:54:02 24 A Megan Pete.

03:54:04 25 Q A lot of interesting things taking place with

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03:54:06 1 a lot of people?

03:54:07 2 A Yeah, I feel like with claims coming from
03:54:09 3 Desiree's daughter, with some of the things that
03:54:12 4 happened, that it's very possible that -- who knows.

03:54:15 5 Q Okay. Anything is possible; right? Let them
03:54:18 6 deny it.

03:54:31 7 Oh. Who is the person you just mentioned --
03:54:32 8 Desiree?

03:54:33 9 A Yes.

03:54:33 10 Q What is the full name?

03:54:34 11 A Desiree Perez.

03:54:36 12 Q Have you ever spoken to her?

03:54:37 13 A No.

03:54:38 14 Q Have you ever spoken to any member of her
03:54:39 15 family?

03:54:40 16 A Yes.

03:54:41 17 Q Which one?

03:54:42 18 A Her daughter Demoree.

03:54:43 19 Q What's her name?

03:54:43 20 A Demoree.

03:54:44 21 Q How many times have you spoken to Demoree?

03:54:46 22 A A handful.

03:54:47 23 Q What's the most recent time?

03:54:52 24 A I couldn't say.

03:54:53 25 Q That's the first time I heard that noise in a

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03:54:54 1 deposition.

03:55:01 2 A I'm sorry.

03:55:01 3 Q No. It's good.

03:55:03 4 A A few months ago.

03:55:04 5 Q What were the circumstances?

03:55:05 6 A I interviewed her. I was set to interview

03:55:07 7 her.

03:55:07 8 Q And did you, in fact, interview her?

03:55:09 9 A Yes.

03:55:09 10 Q All right. So when is the first time you

03:55:13 11 spoke to Demoree?

03:55:14 12 A I don't recall.

03:55:17 13 Q How did you connect with her?

03:55:18 14 A Instagram.

03:55:22 15 Q Who reached out to who?

03:55:23 16 A Her husband sent me a message, and I didn't

03:55:25 17 feel comfortable speaking with her husband; so I wrote

03:55:28 18 her.

03:55:28 19 Q And what did the message from the husband say?

03:55:30 20 A I don't recall what it said. But it was -- it

03:55:34 21 had to do with her allegations, like, what he was

03:55:37 22 claiming.

03:55:40 23 Q The husband of Desiree's daughter reached out

03:55:43 24 to you?

03:55:44 25 A Yes.

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03:55:44 1 Q And said something about allegations.

03:55:47 2 Did he tell you what he wanted to talk about,

03:55:48 3 or why he was talking?

03:55:50 4 A No. He didn't want to talk to me. I believe

03:55:51 5 it was just a message about some things she had posted.

03:55:54 6 It was my blog page; so I think maybe he wanted me to

03:55:56 7 repost just maybe something she posted, or something

03:55:58 8 like that.

03:55:59 9 Q And did you do that?

03:56:00 10 A No.

03:56:01 11 Q And you said you weren't comfortable dealing

03:56:04 12 with the husband?

03:56:05 13 A Yeah. I didn't want to speak to him. I

03:56:07 14 wanted to talk to her. Yeah.

03:56:09 15 Q Did you ever talk to the husband?

03:56:10 16 A No.

03:56:11 17 Q Okay. Then when did you first talk to the

03:56:14 18 daughter?

03:56:15 19 A I couldn't say exactly.

03:56:17 20 Q This year?

03:56:19 21 A Yes.

03:56:21 22 Q All right. So the first -- and -- and the

03:56:23 23 message from the husband, was that also this year?

03:56:25 24 A Yes.

03:56:25 25 Q Can you put it in time? Was it a few months

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03:56:28 1 ago? Beginning of the year?

03:56:30 2 A All I can say is a few months, but I don't
03:56:32 3 know exactly when.

03:56:33 4 Q All right. So -- and did you know any of
03:56:36 5 these players before the husband reached out?

03:56:39 6 A Did I know them? No.

03:56:40 7 Q I mean, did you know of them? Did you know
03:56:42 8 who the reference was to?

03:56:44 9 A When the husband said something?

03:56:46 10 Q Yeah.

03:56:46 11 A Yes. By that point, yes.

03:56:50 12 Q Okay. And what did you know by that point?

03:56:52 13 A I had watched an exclusive on a news station.
03:56:57 14 Demoree did an interview with local news, in Florida.

03:57:01 15 Q And that was earlier this year?

03:57:03 16 A I don't know when she recorded, but I saw it
03:57:05 17 this year.

03:57:06 18 Q Okay. And that was before the husband reached
03:57:12 19 out?

03:57:13 20 A That I saw the interview?

03:57:14 21 Q Yeah.

03:57:14 22 A Yes.

03:57:14 23 Q All right. So you generally knew that, what
03:57:16 24 is going on in this case. And then he reached out and
03:57:18 25 said, "I want to get you involved in the case"?

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03:57:20 1 A No. He just -- I believe that he sent
03:57:22 2 something -- maybe that had been posted. He didn't ask
03:57:24 3 me to do anything. I just feel like it was a -- like,
03:57:28 4 trying to bring awareness maybe to it, but I don't
03:57:31 5 remember exactly what the message said.

03:57:33 6 Q It was just, like -- what was it, like the
03:57:34 7 Megan video. Someone just said, "Hey, have you seen
03:57:37 8 this?"

03:57:37 9 A Once again, I don't remember exactly what it
03:57:39 10 said, but I know that it was about what his wife had
03:57:42 11 been saying.

03:57:42 12 Q Do you -- do you still have that message?

03:57:45 13 A I don't know.

03:57:48 14 Q Any reason to think you won't be able to --
03:57:50 15 what -- what -- how did you -- did you say Instagram?

03:57:53 16 A Instagram, uh-huh.

03:57:54 17 Q All right. Is that -- is that the kind of
03:57:56 18 message that would stay there?

03:57:57 19 A It depends on setting. Some people do
03:58:00 20 vanishing messages.

03:58:01 21 Q What do you do?

03:58:03 22 A I don't have on vanishing messages.

03:58:05 23 Q So probably it's still there; right?

03:58:07 24 A Well, he sent it, not me; so I don't know. He
03:58:09 25 could have vanishing messages on. It was his message,

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03:58:13 1 not mine.

03:58:14 2 Q Okay. And -- so how does that -- how do you
03:58:19 3 get a message like that? Does it show up on your --
03:58:22 4 what?

03:58:23 5 A You get a notification when you go on the app.

03:58:26 6 Q All right. You are on Instagram, and it says
03:58:27 7 you have a message from husband of --

03:58:31 8 A Once again, you can change your settings. But
03:58:33 9 for me, when I go on Instagram, I see the number of
03:58:36 10 messages that I have, new messages, and I just kind of
03:58:38 11 go through them. It doesn't tell me particularly who.

03:58:41 12 Q Okay. And you went through, and you found
03:58:42 13 this message from this guy, and you said -- did you
03:58:44 14 actually respond to the message?

03:58:47 15 A I don't believe so.

03:58:47 16 Q How -- I know you said you didn't want to talk
03:58:49 17 to him, but you would have wanted to talk to the
03:58:51 18 daughter or his wife.

03:58:53 19 How did you get connected?

03:58:56 20 A I DM'd her on Instagram.

03:58:59 21 Q Oh, 'cause you knew her -- her identifier on
03:59:02 22 Instagram also?

03:59:02 23 A Yeah. She had already been publicly speaking
03:59:04 24 on her situation, yes.

03:59:06 25 Q Okay. So you reached out to her. And tell me

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03:59:09 1 what that exchange was. All the way to when you got
03:59:12 2 together and interviewed.

03:59:15 3 A I don't remember exactly what I said, but I
03:59:16 4 know our conversation was centered around her case. And
03:59:19 5 she wanted to do an interview and asked me if I would do
03:59:23 6 one.

03:59:24 7 Q She wanted you to interview her?

03:59:26 8 A Yes.

03:59:26 9 Q About the allegations in the case?

03:59:28 10 A In her case, yes.

03:59:29 11 Q In her case. All right.

03:59:31 12 And did that happen?

03:59:32 13 A Yes, I interviewed her.

03:59:33 14 Q Okay. When was that?

03:59:35 15 A I don't know the exact date, but a few months
03:59:37 16 ago.

03:59:37 17 Q Okay.

03:59:38 18 A No more than three.

03:59:39 19 Q Okay. And what platform was that on?

03:59:41 20 A I did not publish it.

03:59:43 21 Q Okay. Literally, how -- like, you guys just
03:59:48 22 sat in the room and recorded it?

03:59:50 23 A Oh, she called me on Zoom. We did a Zoom, and
03:59:52 24 I recorded it on Zoom.

03:59:53 25 Q Okay. And how long was that session?

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03:59:59 1 A At least two hours.

04:00:03 2 Q Okay. And is it done in a way that -- that
04:00:05 3 you -- you can turn it into, like, a -- an interview
04:00:08 4 that would be on your -- one of your platforms?

04:00:11 5 A Yes.

04:00:11 6 Q You did it to -- you were doing the interview,
04:00:13 7 but you just -- why haven't you posted it?

04:00:17 8 A I did not want to come off as I was trying to
04:00:20 9 agitate a situation or target anyone in particular or
04:00:23 10 anything like that; so I felt like it was best I didn't.

04:00:26 11 Q And what is the -- like, was that before or
04:00:30 12 after the gag order in this case?

04:00:33 13 A Demoree?

04:00:35 14 Q This interview you did, yeah.

04:00:36 15 A I did it before her gag order, because I
04:00:37 16 remember she thought that it was possible she could be
04:00:41 17 gagged; so she was trying to rush to do it.

04:00:48 18 Q Okay. But were you already gagged?

04:00:50 19 A In my case?

04:00:51 20 Q Yes.

04:00:55 21 Let me ask a better question. Is the reason
04:00:57 22 that you have chosen not to publish or put out the
04:01:00 23 interview related to the fact that you have a gag order
04:01:03 24 in your current case with Megan?

04:01:06 25 A No.

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04:01:06 1 Q Okay. Is it related to the fact that the
04:01:10 2 daughter has a gag order in her case?
04:01:13 3 A No. It's related to me being terrified of
04:01:16 4 Desiree Perez.
04:01:18 5 Q Okay. So the interview is in a -- in a --
04:01:27 6 you've got it preserved, and you can play it at any
04:01:29 7 time. But, for now, you are choosing not to go public
04:01:33 8 with it?
04:01:34 9 A It's recorded. Yeah. Yeah. It was recorded.
04:01:37 10 Q Okay. Have you talked to a lawyer about that
04:01:38 11 interview? Legal risks for you?
04:01:42 12 A I spoke to her lawyer.
04:01:47 13 Q Desire's lawyer, or the daughter's lawyer?
04:01:50 14 A Demoree's lawyer.
04:01:52 15 Q Demoree's.
04:01:52 16 How do you spell her name?
04:01:53 17 A D-E-M-O-R-E-E.
04:01:56 18 Q And what did Demoree's lawyers say to you
04:02:02 19 about the interview? Or about anything?
04:02:04 20 MR. MCLYMONT: Objection to privileged
04:02:08 21 information.
04:02:09 22 MS. DIXON: Privileged.
04:02:09 23 MR. O'SULLIVAN: Is it privilege between
04:02:11 24 Demoree's lawyer and Ms. Cooper?
04:02:13 25 MS. DIXON: Were your --

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04:02:16 1 MR. MCLYMONT: Whatever was said between the
04:02:18 2 two of them, if it was said for the purpose of providing
04:02:20 3 legal advice, then it's privileged.

04:02:22 4 MR. O'SULLIVAN: No. It's not privileged if
04:02:24 5 someone other than the lawyer and the client are in the
04:02:26 6 conversation.

04:02:27 7 THE WITNESS: The lawyer did not want to speak
04:02:29 8 if my lawyer wasn't there. So actually, he waited until
04:02:32 9 my lawyer could be present, and we all were present for
04:02:35 10 the conversation I had with him about this.

04:02:37 11 BY MR. O'SULLIVAN:

04:02:38 12 Q Got it.

04:02:38 13 And you were there, and your lawyer was there;
04:02:40 14 right?

04:02:40 15 A On the phone.

04:02:41 16 Q On the phone.

04:02:42 17 Who was your lawyer?

04:02:45 18 A Oh, at the time -- at the time, I was still
04:02:47 19 under, I believe, Unite The People. Was I? I have to
04:02:55 20 go back and see the exact date. But I know for certain
04:02:57 21 that the lawyer didn't want to speak unless the other
04:02:59 22 lawyer was present.

04:03:00 23 Q I get it. That doesn't change the privilege
04:03:02 24 calculation.

04:03:03 25 So you were there with your lawyer; right?

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04:03:05 1 A Uh-huh.

04:03:05 2 Q And Demoree was on the call with her lawyer?

04:03:08 3 A Yes.

04:03:08 4 Q Okay. That's not a privileged conversation;

04:03:10 5 so tell me what was said.

04:03:12 6 MS. DIXON: I'm go to object based on

04:03:12 7 privilege because I'm the lawyer that was on the phone.

04:03:15 8 MR. O'SULLIVAN: I understand.

04:03:15 9 MS. DIXON: I'm going to object.

04:03:16 10 MR. O'SULLIVAN: But you are a smart lawyer,

04:03:17 11 and you know that if you are on a call with your client

04:03:19 12 and someone who is not your client, and that person was

04:03:21 13 not your client's lawyer --

04:03:21 14 MS. DIXON: And a lawyer. I wasn't on --

04:03:23 15 Demoree wasn't on the phone call. It was the lawyer.

04:03:26 16 MR. O'SULLIVAN: I'm going to ask a different

04:03:27 17 question.

04:03:27 18 BY MR. O'SULLIVAN:

04:03:31 19 Q Did -- did you have an arrangement with

04:03:37 20 Demoree that you were -- had a common interest? You

04:03:41 21 were working together on the case? Like, an agreement

04:03:44 22 to keep privilege together?

04:03:47 23 MS. DIXON: Objection.

04:03:47 24 BY MR. O'SULLIVAN:

04:03:48 25 Q Any kind of arrangement that said, "we're all

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04:03:50 1 on the same team"?

04:03:51 2 MS. DIXON: Privileged.

04:03:52 3 THE WITNESS: No.

04:03:52 4 BY MR. O'SULLIVAN:

04:03:52 5 Q Okay. Did anyone say on that call that it was

04:03:57 6 subject to attorney-client privilege?

04:04:01 7 A I don't recall.

04:04:02 8 Q Okay. What was said on the call?

04:04:04 9 MS. DIXON: Objection. It's attorney-client

04:04:07 10 work product and privileged.

04:04:08 11 BY MR. O'SULLIVAN:

04:04:09 12 Q You can answer.

04:04:10 13 A I can answer?

04:04:10 14 Q You can answer.

04:04:11 15 A What was said was just to focus on her and

04:04:14 16 what she was going through in her case.

04:04:18 17 Q All right. Well, wait. So you have Demoree's

04:04:22 18 lawyer --

04:04:22 19 MR. O'SULLIVAN: Which is you, Ronda?

04:04:23 20 MS. DIXON: I'm not Demoree's lawyer.

04:04:25 21 MR. O'SULLIVAN: Okay.

04:04:25 22 BY MR. O'SULLIVAN:

04:04:26 23 Q Who was on for Demoree?

04:04:27 24 A Her lawyer.

04:04:28 25 Q And do you know what that is?

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04:04:30 1 A No. I am sorry.

04:04:31 2 Q A man or woman?

04:04:32 3 A A man.

04:04:33 4 MS. DIXON: Can I answer? His name was
04:04:33 5 Napoleon Hamilton.

04:04:36 6 BY MR. O'SULLIVAN:

04:04:36 7 Q Napoleon Hamilton.

04:04:36 8 Okay. So Napoleon Hamilton's on there,
04:04:38 9 Demoree is on there, and you are on there, and somebody
04:04:39 10 for you.

04:04:39 11 And do you know who the person for you was?

04:04:43 12 A I believe it was Ronda. Like I said, my
04:04:45 13 representation was changing, and I don't remember the
04:04:48 14 exact date we spoke.

04:04:49 15 Q All right. Some lawyer was on there for you?

04:04:50 16 A Absolutely, yeah. Because he wouldn't talk
04:04:52 17 without a lawyer.

04:04:52 18 Q Okay. How long did the conversation last?

04:04:56 19 A Less than 30 minutes. It was quick.

04:04:58 20 Q Less than 30 minutes?

04:04:59 21 A Right. Maybe less than 20, less than 15. It
04:05:02 22 was quick.

04:05:03 23 Q Okay. And did everyone speak?

04:05:10 24 A I believe it was more so the lawyer just
04:05:12 25 outlining things.

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04:05:14 1 Q Tell me what they outlined.

04:05:15 2 A To just stay focused.

04:05:17 3 Q Which one?

04:05:18 4 A Her lawyer just wanted to make sure that I
04:05:19 5 understood what I could ask her and what the interview
04:05:23 6 would be about, basically.

04:05:25 7 Q And literally, what did he say about that --
04:05:27 8 Napoleon -- about what you could ask her, and what it
04:05:30 9 would be about?

04:05:31 10 A That -- it was basically highlighting what her
04:05:34 11 case was about and just saying this is what is going on;
04:05:39 12 so whatever you ask it, you know, should be relative to
04:05:41 13 these things, her claims.

04:05:44 14 Q Okay. So is that how the conversation
04:05:46 15 started. Here -- thank you for coming. Here is what
04:05:49 16 you can ask, and here is what you can't?

04:05:51 17 A No. He didn't say, like, you can ask this,
04:05:53 18 you can't ask that. But he just basically reiterated
04:05:56 19 what the case was about and, like, kind of was just
04:05:59 20 giving me bullet points and saying this is the focus.

04:06:02 21 Q Got it. All right.

04:06:03 22 And then -- and then what did you say?

04:06:06 23 A And I said, "Okay. I can do that."

04:06:08 24 Q And did your lawyer talk?

04:06:13 25 A I don't recall.

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04:06:15 1 Q Did Demoree talk?

04:06:20 2 A I don't believe so at that time. It was more

04:06:21 3 about her lawyer.

04:06:22 4 Q All right. Quick call about bullet points,

04:06:23 5 and you said, "I can do that"?

04:06:25 6 A Yes.

04:06:25 7 Q All right.

04:06:26 8 Have you had subsequent conversations with

04:06:33 9 them? With the lawyer for Demoree?

04:06:35 10 A No.

04:06:36 11 Q Was the lawyer there for the Demoree

04:06:39 12 interview?

04:06:40 13 A I don't believe so, but I couldn't say.

04:06:42 14 Q 'Cause you guys were on Zoom?

04:06:43 15 A Right. And I only saw her on screen.

04:06:46 16 Q All right. And have you been in touch since

04:06:47 17 you did that interview?

04:06:49 18 A No.

04:06:50 19 Q Have you been in touch with your lawyer since

04:06:52 20 you did that interview?

04:06:53 21 A No.

04:06:53 22 Q Do you know if her lawyer has been in touch

04:06:56 23 with your lawyers since that interview?

04:06:57 24 A I do not.

04:07:05 25 Q Okay.

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04:07:06 1 MS. HAYRAPETIAN: Can we pull up Tab 20 B-1
04:07:09 2 audio?
04:07:12 3 STENO TECH ASSISTANT: 20 B-1?
04:07:17 4 MS. HAYRAPETIAN: Yes. 20 B-1.
04:07:20 5 STENO TECH ASSISTANT: Thank you.
04:07:20 6 MS. HAYRAPETIAN: Which would, I believe, be
04:07:22 7 Exhibit 58-A.
04:07:23 8 MR. O'SULLIVAN: It's 58?
04:07:23 9 MS. HAYRAPETIAN: Uh-huh. 58-A, and that is
04:07:25 10 58-B, the transcript.
04:07:41 11 STENO TECH: So, for 20 B-1, I have that just
04:07:43 12 as, like, a PDF file.
04:07:45 13 Did you mean 20 A-1?
04:07:48 14 MS. HAYRAPETIAN: Yes. Sorry. 20 A-1.
04:07:50 15 STENO TECH ASSISTANT: Okay.
04:07:53 16 MS. DIXON: Where is the transcript? What's
04:08:06 17 the number?
04:08:08 18 MR. O'SULLIVAN: The transcript is Exhibit 58.
04:08:17 19 MS. DIXON: And the video was 20 A?
04:08:20 20 MR. O'SULLIVAN: Those are just internal
04:08:21 21 numbers, that's going to be confusing. I would go by
04:08:23 22 these.
04:08:23 23 MS. DIXON: Okay.
04:08:24 24 MS. HAYRAPETIAN: I think we can play.
04:08:28 25 STENO TECH ASSISTANT: Playing.

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04:08:29 1 (A video clip was played.)

04:08:29 2 (Exhibit 58-A was marked for identification.)

04:08:29 3 (Exhibit 58-B was marked for identification.)

04:09:26 4 BY MR. O'SULLIVAN:

04:09:27 5 Q All right. Did you say all of that that we

04:09:29 6 just heard?

04:09:29 7 A Yes.

04:09:29 8 Q Okay. You did not prove that she was shot in

04:09:31 9 court; right? That's what you said?

04:09:33 10 A Yes.

04:09:33 11 Q She was -- Tory was convicted of shooting her

04:09:36 12 in this case. Yeah?

04:09:38 13 A I believe so, yes.

04:09:39 14 Q Meaning she was shot. The jury found that.

04:09:41 15 Yeah?

04:09:42 16 MS. DIXON: Objection. Mischaracterization.

04:09:44 17 BY MR. O'SULLIVAN:

04:09:45 18 Q You were there.

04:09:45 19 A That means that a jury --

04:09:46 20 MR. MCLYMONT: Objection to form as well.

04:09:51 21 BY MR. O'SULLIVAN:

04:09:52 22 Q Right? In your presence, the jury entered a

04:09:54 23 verdict that Tory shot Megan. Yeah?

04:09:57 24 A The jury decided that.

04:09:58 25 Q Yes. Okay. And this is two years later. And

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04:10:00 1 you are saying no, it was never proved?

04:10:03 2 A In my opinion, that case was not proven. I
04:10:05 3 heard the prosecutor say the DNA did not matter, they
04:10:08 4 did not show us bullet fragments; so I felt like that
04:10:10 5 was enough to question things.

04:10:11 6 Q All right. But you keep saying that. You ask
04:10:13 7 questions. Lots of people have questions. That's very
04:10:15 8 different than actually asserting that something
04:10:17 9 happened or somebody told the truth or a lie.

04:10:19 10 You get the difference; right?

04:10:21 11 A That's my whole point.

04:10:22 12 Q And you're -- I -- I am trying to understand
04:10:23 13 if you think it's okay if I have questions; maybe I
04:10:26 14 didn't read all the evidence; maybe I wasn't there for
04:10:29 15 everything; maybe I misinterpreted something; maybe I
04:10:31 16 didn't get the full report; whatever that is -- you have
04:10:33 17 questions, to go from there -- you think it's okay to go
04:10:35 18 from there to saying somebody lied, or somebody didn't
04:10:39 19 prove something?

04:10:40 20 A I think --

04:10:41 21 Q You are making a leap. You see that; right?

04:10:43 22 A I don't.

04:10:43 23 I feel like in this country, we're supposed to
04:10:46 24 have the freedom to speak; and if we have a question,
04:10:48 25 regardless of if I identify with it or not, we should be

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04:10:51 1 allowed to ask.

04:10:53 2 Q Even if it's damaging to the other person, and
04:10:54 3 even if it's not true, and even if you didn't do the
04:10:56 4 investigation you needed? You can say it even if it
04:10:58 5 hurts them and no consequences -- you believe that?

04:11:00 6 A I believe that we can pose questions, and I
04:11:02 7 believe I had valid questions.

04:11:04 8 Q Okay. And do you think asking a question is
04:11:07 9 different than accusing somebody of something?

04:11:10 10 A Yes.

04:11:10 11 Q Okay. And you've done both; right?

04:11:13 12 A Depending upon what you are asking about. I
04:11:15 13 would need something specific.

04:11:17 14 Q Okay. If you said, "Megan lied."

04:11:19 15 A Uh-huh.

04:11:20 16 Q At the trial.

04:11:21 17 A I do not recall saying that.

04:11:23 18 Q Okay. If you said that, that's not a
04:11:24 19 question, is it?

04:11:25 20 A If I had said that, that would be an
04:11:27 21 assertion.

04:11:28 22 Q Yes. Okay.

04:11:28 23 A But I don't recall saying that.

04:11:30 24 Q Okay. Have you made assertions about Megan
04:11:34 25 that are false?

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04:11:35 1 A Not to my knowledge.

04:11:36 2 Q Okay. Wouldn't you say that saying that Megan
04:11:47 3 being shot was not proven in court is false?

04:11:50 4 A I don't believe that's false.

04:11:51 5 Q Okay. But under the system that you said, in
04:11:54 6 America, we live, we go to trial, we put evidence, we
04:11:57 7 have rules, and a jury decides; right?

04:11:59 8 And, if the jury enters a verdict on an
04:12:04 9 indictment, or criminal charges, in the way that the
04:12:07 10 people in the system talk about it, they say it was
04:12:09 11 proven. It was proven to the people who matter, the
04:12:12 12 jury. You saw that; right? They were convinced.

04:12:16 13 A I saw that. And I also know the systems we
04:12:19 14 have, and they exist because they can be challenged.

04:12:23 15 Q I understand. But in this case, in the moment
04:12:25 16 when you would either prove it or not prove it, they
04:12:27 17 proved it true; true?

04:12:28 18 MS. DIXON: Objection. Objection to form.

04:12:31 19 THE WITNESS: I cannot say that. That's just
04:12:32 20 what the jury believed.

04:12:33 21 BY MR. O'SULLIVAN:

04:12:33 22 Q And that's who matters on the question of
04:12:34 23 whether a case was proved in court -- is the conclusion
04:12:37 24 of the jury; right?

04:12:38 25 MR. MCCLYMONT: Objection.

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04:12:38 1 THE WITNESS: Right.

04:12:38 2 BY MR. O'SULLIVAN:

04:12:38 3 Q Nobody else's conclusion matters?

04:12:41 4 A But when people come to my show, they want to

04:12:44 5 know what I think.

04:12:44 6 Q Okay.

04:12:44 7 MS. HAYRAPETIAN: Can we please pull up

04:12:44 8 Tab 10-A audio?

04:13:09 9 STENO TECH ASSISTANT: Just a moment, please.

04:13:38 10 MS. DIXON: I don't have one.

04:13:41 11 MR. O'SULLIVAN: Here.

04:13:41 12 STENO TECH ASSISTANT: Ready to play whenever

04:13:41 13 you like.

04:13:42 14 MS. DIXON: Thank you.

04:13:58 15 STENO TECH ASSISTANT: Would you like for me

04:13:59 16 to play the audio?

04:14:01 17 MR. O'SULLIVAN: Yes, please. Thank you.

04:14:03 18 (A video clip was played.)

04:14:12 19 MS. DIXON: Can you turn it up a little?

04:17:09 20 (A video clip was played.)

04:17:09 21 (Exhibit 59-A was marked for identification.)

04:17:09 22 (Exhibit 59-B was marked for identification.)

04:18:00 23 BY MR. O'SULLIVAN:

04:18:01 24 Q All right. Was that you talking on the audio

04:18:05 25 we just heard?

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04:18:06 1 A Yes.

04:18:06 2 Q All right.

04:18:07 3 MR. O'SULLIVAN: And that is Exhibit, what,

04:18:07 4 55?

04:18:11 5 THE COURT REPORTER: 59.

04:18:11 6 MR. O'SULLIVAN: I'm sorry. 59.

04:18:13 7 BY MR. O'SULLIVAN:

04:18:13 8 Q Okay. And you have the transcript in front of

04:18:15 9 you, right, 59-B?

04:18:17 10 A Yes.

04:18:17 11 Q All right. So just going to the end, it says

04:18:19 12 here -- you are talking about this question of how

04:18:24 13 Akademiks had some information before it even came out

04:18:32 14 in court; right?

04:18:33 15 A Uh-huh.

04:18:33 16 Q And somebody got in trouble for that; right?

04:18:36 17 That's what you are talking about here.

04:18:38 18 A Did someone get in trouble? I don't know.

04:18:40 19 Q Well, you say, "Because Akademiks got the same

04:18:43 20 sources I got."

04:18:44 21 A Okay.

04:18:44 22 Q So let's go with that.

04:18:45 23 A Okay.

04:18:46 24 Q What sources do you have that Akademiks also

04:18:50 25 has?

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04:18:51 1 A I'm referencing the -- I got a lot of tips
04:18:54 2 from listeners. So I had a hotline. Still have it. A
04:18:58 3 Google Voice number to people would send me information,
04:19:01 4 people DM me on Instagram. So there were a lot of --
04:19:05 5 Q Okay. It's just unsolicited people calling in
04:19:08 6 and saying, "I got a tip." But what about -- you must
04:19:11 7 know who the source is that -- that you overlap with
04:19:14 8 Akademiks; right? Who were you both relying on?
04:19:16 9 It sounds like it's the person who maybe knew
04:19:21 10 Tory's strategy before it came out. Yeah?
04:19:23 11 A No. What happened was this case was --
04:19:26 12 something people were interested in; so you had people
04:19:29 13 from all over tuned in and giving, quote/unquote,
04:19:31 14 "tips."
04:19:32 15 Q But why would some random tipster have inside
04:19:36 16 intel on Tory's -- what he is going to do in court that
04:19:39 17 day?
04:19:39 18 A Because people are at the court, walking up
04:19:42 19 and down the hallway, listening in, and sitting in. You
04:19:44 20 know --
04:19:45 21 Q And was that -- was that your source? Someone
04:19:46 22 who heard something in the hallway at court?
04:19:48 23 A I couldn't say how they got the information.
04:19:50 24 But by the time they came to me, I felt like it was
04:19:53 25 true.

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04:19:53 1 Q Okay. Can you give me a name of a single
04:19:55 2 source you relied on to say what you were saying about
04:19:57 3 the Tory case?

04:19:58 4 A No.

04:19:59 5 Q You don't have a single source that you know
04:20:00 6 their name?

04:20:01 7 A Well, it's social media users. Like I said, I
04:20:03 8 was getting tips --

04:20:04 9 Q So I'm just saying, in terms of reliability
04:20:06 10 and how -- how much diligence you did, you don't know
04:20:08 11 the name of any of the people who you relied on to put
04:20:11 12 all this stuff out?

04:20:12 13 A No. So what would happen is, if someone gave
04:20:15 14 me some information, I would try my best to follow up on
04:20:18 15 it. So sometimes, based on the information, if it
04:20:20 16 turned out to be accurate, that would be someone I would
04:20:22 17 be more liable to kind of consider if they gave me
04:20:25 18 something else.

04:20:25 19 Q All right. Who were you referring to when you
04:20:27 20 say the source of this information that, to you, is also
04:20:31 21 the source that Akademiks had? Who is that source?

04:20:34 22 A Once again, I was getting a lot of tips at
04:20:36 23 that time. I can't say exactly who it was. I was
04:20:39 24 getting a lot of information. A lot of this happened
04:20:41 25 and that happened, because I was covering it so heavily.

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04:20:43 1 Q All right. Tell me everything you know that
04:20:44 2 caused you to think that source was reliable or knew
04:20:48 3 what they were talking about or had any basis to say
04:20:51 4 what they said.

04:20:52 5 A So, when I got that information -- different
04:20:54 6 ways. People were, like I said, were sending me --

04:20:56 7 Q Well, stick with one. Give me one example of
04:20:58 8 how you really got it, not general. I want specifically
04:21:01 9 how you came from a source to get information,
04:21:04 10 everything you knew about them -- their reliability.
04:21:06 11 What got you in a position to keep putting this stuff
04:21:09 12 out?

04:21:09 13 A Well, in terms of this particular thing, it
04:21:12 14 wasn't me being able to rely on the person, per se.

04:21:15 15 When Akademiks would also echo the same
04:21:18 16 sentiment, I felt like well, maybe it is more valid. I
04:21:20 17 felt like we have to be getting information from the
04:21:22 18 same people, because I heard that too.

04:21:24 19 Q I understand that. But you said,
04:21:26 20 affirmatively, Akademiks has the same sources I have;
04:21:29 21 right?

04:21:30 22 A Right. Because if he is repeating the same
04:21:31 23 thing, it had to be -- it can't be too many different
04:21:34 24 people, I wouldn't think.

04:21:35 25 Q Why? You are just guessing about what is

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04:21:37 1 going on there, aren't you?

04:21:38 2 A Yeah. Yeah.

04:21:39 3 Q It could be a complete setup. People just
04:21:41 4 feeding you stuff; right?

04:21:42 5 A It could be.

04:21:43 6 Q Any reason to believe it's not that? If you
04:21:47 7 don't literally know who you are dealing with?

04:21:49 8 A I don't know. But, once again, I felt like
04:21:51 9 Akademiks had a substantial platform, and that he
04:21:54 10 wouldn't risk it if he didn't believe it enough; so I
04:21:56 11 felt like, yeah, it's more than likely true.

04:21:59 12 Q And above that, it says, "Akademiks deleted
04:22:02 13 his shit"?

04:22:03 14 A Uh-huh.

04:22:04 15 Q What's that mean?

04:22:04 16 A Akademiks got into a spat with Megan about it,
04:22:07 17 and he ended up just deleting his tweet.

04:22:13 18 Q And you are making -- and you are saying
04:22:15 19 really loud and proud I'm not deleting shit; right? I
04:22:17 20 stand by my --

04:22:18 21 A It's not about being loud and proud. It's
04:22:21 22 don't be attacked and cower.

04:22:22 23 Q Even if you are lying your ass off?

04:22:24 24 A Well, once again, how do you know you're
04:22:25 25 lying?

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04:22:26 1 Q How do you know you are not?

04:22:27 2 A That is why.

04:22:28 3 Q What do you have to show me, right now, that

04:22:31 4 says that was true, what I said?

04:22:32 5 A That's why --

04:22:34 6 Q Some random social media hotline thing?

04:22:36 7 A That is --

04:22:37 8 Q From a name you don't know?

04:22:38 9 A That's why it's important for people to answer

04:22:40 10 to it. You don't know until it's confirmed or denied.

04:22:43 11 Q So you feel free to say whatever you want,

04:22:45 12 true or false, and let them deny it?

04:22:47 13 A No.

04:22:47 14 Q And then once they've denied it, like -- like

04:22:49 15 the doctor did here, you say now I can't say it anymore

04:22:52 16 because they actually denied to my face?

04:22:54 17 A No. I just feel like it's important to, you

04:22:57 18 know, ask questions and pose questions to everything.

04:23:18 19 Q All right. What was the -- what was the issue

04:23:21 20 that was going on during this conversation about the DNA

04:23:24 21 evidence? That's what came out, that what Akademiks was

04:23:28 22 talking about before they even brought it up in court;

04:23:31 23 right?

04:23:31 24 A Well, I don't know. I'm referencing a tweet.

04:23:33 25 There was a tweet published that spoke to DNA.

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04:23:36 1 Q Yeah. And -- and Akademiks deleted it; right?

04:23:41 2 A Uh-huh.

04:23:41 3 Q And the problem with the tweet was that he was

04:23:44 4 completely wrong about what the evidence meant; right?

04:23:46 5 A Well, Akademiks actually streamed and -- and

04:23:48 6 asserted his claims, and he said he would not be taking

04:23:51 7 it back. He did delete his tweet, but he actually

04:23:53 8 reasserted it on his platform.

04:23:56 9 Q Okay.

04:23:56 10 THE VIDEOGRAPHER: Counsel.

04:23:56 11 MR. O'SULLIVAN: Uh-huh.

04:23:56 12 THE VIDEOGRAPHER: Can you please get the

04:23:56 13 paper away from the mic? Thank you.

04:24:21 14 BY MR. O'SULLIVAN:

04:24:36 15 Q All right. Over the course of all of your

04:24:43 16 dealings with Tory's father, at any point during that,

04:24:49 17 did you get guidance or bullets or information of any

04:24:54 18 kind from him about their take on the case?

04:24:58 19 A No.

04:24:58 20 Q Okay. Did he give you any information --

04:25:00 21 good, bad, indifferent -- that they wanted to get out

04:25:05 22 about their case?

04:25:06 23 A He would give me his opinions and he would

04:25:09 24 tell me how he felt about, maybe, the day or stuff like

04:25:13 25 that.

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04:25:14 1 Q During the trial?

04:25:16 2 A Not during the trial because, I was taking
04:25:18 3 notes at that time. Prior to.

04:25:21 4 Q Prior to. Okay.

04:25:22 5 A Uh-huh.

04:25:23 6 Q And your testimony is he never asked you to
04:25:30 7 put out any particular message or viewpoint or tried to
04:25:34 8 guide you on that at any time in your dealings?

04:25:38 9 A Sonstar never asked me to do anything like
04:25:39 10 that. He may speak to certain things, but it was up to
04:25:44 11 you and me in that case what you wanted to do with it.

04:25:48 12 Q But the things he would speak to in your
04:25:49 13 presence were things that cast -- that suggested Tory
04:25:54 14 was not guilty; right?

04:25:57 15 A I wouldn't say that because he wasn't there.
04:26:00 16 So all that he would say is that he loves his son, and
04:26:03 17 that he didn't believe his son would do something like
04:26:05 18 that. And he was going through it, you know, listening
04:26:08 19 like everybody else.

04:26:11 20 Q Okay. Have you ever interviewed Drake?

04:26:40 21 A No.

04:26:41 22 Q Have you ever spoken to Drake?

04:26:42 23 A No.

04:26:43 24 Q Have you viewed Nicki Minaj?

04:26:45 25 A Yes.

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04:26:45 1 Q How many times?

04:26:47 2 A Maybe four.

04:26:48 3 Q What's the most recent time?

04:26:54 4 A Maybe 2024. Maybe. I'm not certain.

04:26:58 5 Q And when was the first time?

04:27:04 6 A Maybe 2023. Maybe. I'm not certain.

04:27:08 7 Q Okay. So four times.

04:27:09 8 And how did those -- those interviews come

04:27:18 9 about? Did you reach out to her? She's famous.

04:27:26 10 A The first time that I was able to do an

04:27:29 11 interview was through -- the woman that I worked with on

04:27:32 12 Onsite! is a personal friend of hers, and so I was

04:27:35 13 actually -- through co-hosting that show, able to

04:27:38 14 interview her on that platform first.

04:27:40 15 Q All right. So I know you talked about it.

04:27:43 16 The Onsite! is -- is one of your platforms?

04:27:47 17 A It was a show that I was a co-host on.

04:27:49 18 Q Oh, that's right. Okay.

04:27:50 19 A Uh-huh.

04:27:51 20 Q You were interning, and then you turned into a

04:27:53 21 co-host. It was with the Ali; right?

04:27:56 22 A Yes.

04:27:56 23 Q Raj, is it?

04:27:57 24 A Rashidah.

04:27:58 25 Q Rashidah Ali. And -- and you were co-hosting,

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04:28:02 1 and she was friends with Nicki Minaj, and so it was able
04:28:06 2 to be arranged that you would get to interview
04:28:08 3 Nicki Minaj on that show?

04:28:09 4 A That we would, yes.

04:28:10 5 Q Together?

04:28:11 6 A Her as well, yes.

04:28:13 7 Q And that was the first one, and you think that
04:28:15 8 was sometime in '23?

04:28:16 9 A I believe so, but I'm not certain.

04:28:18 10 Q Okay. And in that first interview, was
04:28:21 11 there -- was part of what was talked about Megan Thee
04:28:25 12 Stallion?

04:28:27 13 A I don't believe so.

04:28:29 14 Q Or did that even come up?

04:28:30 15 A I don't believe so in that interview.

04:28:31 16 Q Okay. In any of the interviews with Nicki
04:28:32 17 Minaj, did you discuss Megan Thee Stallion?

04:28:34 18 A There was an appearance that I made on
04:28:37 19 Nicki Minaj's Queen Radio that --

04:28:39 20 Q Queen Radio?

04:28:40 21 A Yes.

04:28:40 22 Q Okay.

04:28:41 23 A And I do believe that Megan was discussed.

04:28:45 24 And I was asked a question, and I worked around it; so I
04:28:49 25 didn't speak on Megan during that segment, but I do

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04:28:52 1 believe she was referenced and was a topic.

04:28:54 2 Q Okay. And when was that Queen Radio
04:28:57 3 interview?

04:28:57 4 A I cannot say. But it was within that -- that
04:29:01 5 time period. The two-year time period.

04:29:03 6 Q Okay. So you think it was in '24?

04:29:06 7 Do you remember, based on what was said in the
04:29:09 8 interview, what was -- what stage the case was at?

04:29:11 9 Was it after Tory had been convicted?

04:29:14 10 A I believe so. Maybe. I'm not certain. I'm
04:29:17 11 sorry.

04:29:17 12 Q Okay. And how did -- how did the topic of
04:29:24 13 Megan come up?

04:29:27 14 A I don't recall.

04:29:27 15 Q That you can recall?

04:29:28 16 A Honestly.

04:29:29 17 Q You remember it -- I guess making a conscious
04:29:31 18 decision not to weigh in yourself; is that right?

04:29:33 19 A Yes.

04:29:34 20 Q And that's 'cause you were concerned about
04:29:36 21 liability?

04:29:38 22 A No. I think it's really important -- I have
04:29:43 23 my own show; so I do things a particular type of way.

04:29:46 24 Q Oh, I see. Okay. Burn your own material?

04:29:49 25 A When you go into other spaces -- no. When you

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04:29:50 1 go into other spaces, it's important to understand
04:29:52 2 people have never heard you are hearing you; so I didn't
04:29:56 3 want to come off -- I know the perception of me in some
04:29:58 4 spaces; so I didn't want to come off like I was, you
04:30:00 5 know, trying to --

04:30:01 6 Q Take the line that they think you always take,
04:30:03 7 which is anti-Megan?

04:30:05 8 A Right. I didn't want to do that.

04:30:06 9 Q Got it. But -- but Nicki Minaj did talk
04:30:09 10 negatively about Megan on that show?

04:30:11 11 A I wouldn't say spoke negatively. I don't
04:30:13 12 remember necessarily about what was said, but I do -- I
04:30:15 13 do feel like she was a topic that day.

04:30:17 14 Q Okay. And do you -- do you remember what
04:30:19 15 about Megan? Was it the -- the shooting or the video?

04:30:23 16 A No. It was not about the shooting.

04:30:25 17 Q No?

04:30:25 18 A No. No.

04:30:26 19 Q All right. But you didn't talk about her on
04:30:28 20 that -- that interview?

04:30:29 21 A No.

04:30:32 22 Q Okay. And what else is on here? I'm trying
04:30:47 23 to read those names. Anna Paulina Luna -- who is that?

04:30:53 24 A She's a representative from Florida.

04:30:56 25 Q Okay. And -- and did she go on your show?

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04:30:59 1 A No.

04:31:00 2 Q Do you know her?

04:31:01 3 A No.

04:31:01 4 Q Have you ever met her?

04:31:02 5 A No.

04:31:03 6 Q How do you even know her? You just know her

04:31:06 7 because she's your rep. Or no.

04:31:07 8 How do you know her?

04:31:08 9 A No. When she -- she said something publicly

04:31:11 10 in regards to Tory Lanez. So that's when I noticed her

04:31:14 11 for the first time. Online.

04:31:16 12 Q Online. And what did she say generally? Pro

04:31:20 13 Tory?

04:31:20 14 A Yes.

04:31:23 15 Q Okay. Diana London -- who is she?

04:31:29 16 A She's someone who says that she's on the team

04:31:32 17 for Tory Lanez.

04:31:33 18 Q All right. What about Wack 100?

04:31:39 19 A You are going to get me in trouble. Okay.

04:31:42 20 Wack 100 is -- I don't know how to describe him. He is

04:31:44 21 a character. I don't know what he goes by -- I don't

04:31:47 22 know how to classify Wack 100.

04:31:49 23 Q Tell me what you know about him.

04:31:50 24 Do you know the person's real name?

04:31:52 25 A No.

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04:31:54 1 Q You think that's his given name. No?

04:31:56 2 A No. I hope not.

04:31:57 3 Q That or the parents have a sense of humor.

04:32:00 4 Okay. Wack 100 and -- and what do you know

04:32:05 5 about him? How did he -- what do you have in common?

04:32:08 6 Team Tory?

04:32:10 7 A I don't -- I wouldn't say we have anything in

04:32:11 8 common. I just know that he speaks on Tory a lot.

04:32:14 9 Q Okay. For the interviews, you did on

04:32:25 10 Nicki Minaj show, did you get paid for those?

04:32:27 11 A No.

04:32:28 12 Q Okay.

04:32:47 13 MR. O'SULLIVAN: 60.

04:32:48 14 MS. DIXON: After this, can we take a break?

04:32:50 15 MR. O'SULLIVAN: You want to do this one real

04:32:50 16 quick and then -- let's just do this exhibit.

04:32:51 17 MS. HAYRAPETIAN: Let's do this and one more

04:32:52 18 and --

04:32:54 19 MR. O'SULLIVAN: Okay.

04:32:54 20 (Exhibit 60 was marked for identification.)

04:32:54 21 BY MR. O'SULLIVAN:

04:32:54 22 Q Ms. Cooper, I'm showing you what we've marked

04:32:56 23 as Exhibit 60. It looks to be a Zoom invite, and I

04:33:03 24 guess, I'll start at the top.

04:33:04 25 Is that your email there

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04:33:04 1 milagrogramz@gmail.com?

04:33:04 2 A Yes.

04:33:09 3 Q All right. Let's see if there's a date on

04:33:11 4 here.

04:33:12 5 All right. This looks start date

04:33:14 6 June 10, 2023.

04:33:15 7 Do you see that?

04:33:16 8 A Uh-huh.

04:33:17 9 Q Okay. Do you recall this -- this Zoom?

04:33:21 10 A Not necessarily. Honestly. No.

04:33:23 11 Q All right. It looks like you were invited by

04:33:27 12 Sonstar; right?

04:33:28 13 A Uh-huh.

04:33:29 14 Q And the subject is "Friends of Sonstar and

04:33:31 15 Daystar." Yeah?

04:33:32 16 A Uh-huh.

04:33:33 17 Q All right. And -- and is this Zoom invite the

04:33:37 18 first time you heard that description, or is that -- is

04:33:41 19 that the name of this group? Like, have you heard that

04:33:44 20 before -- "Friends of Sonstar and Daystar"?

04:33:46 21 A No.

04:33:47 22 Q Okay. Do you consider yourself a friend of

04:33:51 23 Sonstar and Daystar?

04:33:53 24 A Not necessarily, no.

04:33:55 25 Q Did you -- did you say anything to him when

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04:33:57 1 you said why are you having me in this group?

04:33:59 2 A No. I don't even know -- I don't recall this

04:34:02 3 meeting, actually.

04:34:04 4 Q All right. Well, let me ask you about those

04:34:06 5 people. So -- so -- in attendees, it's got Sonstar,

04:34:12 6 it's got to you.

04:34:13 7 A Uh-huh.

04:34:14 8 Q Do you recognize that third one, Duanidy?

04:34:17 9 A I do not.

04:34:18 10 Q How about Joyce Bryant 516?

04:34:20 11 A No.

04:34:20 12 Q How about The King's First Daughter?

04:34:22 13 A No.

04:34:22 14 Q About what about Tea with Tia?

04:34:25 15 A Yes, I do know her.

04:34:26 16 Q Who is Tea with Tia?

04:34:28 17 A A blogger.

04:34:28 18 Q And do you know the person's real name?

04:34:31 19 A I don't know -- I think it's Tia, actually.

04:34:35 20 Q All right. And how did you come to know about

04:34:38 21 Tia with the T?

04:34:42 22 A She came to some of the subsequent -- whatever

04:34:47 23 was going on with the case that was a court appearance

04:34:49 24 she came to one and I met her there.

04:34:53 25 Q You met her in the courthouse, like, watching

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04:34:55 1 the proceedings?

04:34:56 2 A Yeah. She came down for one of -- one of the
04:35:00 3 dates.

04:35:01 4 Q Okay. One of the dates in the trial itself
04:35:04 5 or --

04:35:05 6 A It was after the fact.

04:35:06 7 Q After. Okay.

04:35:06 8 A Uh-huh.

04:35:07 9 Q But maybe the motion for a new trial or?

04:35:09 10 A I couldn't say what it was exactly, but I know
04:35:11 11 it was after the trial, for sure.

04:35:13 12 Q And was Tia also covering the trial like you
04:35:15 13 were?

04:35:16 14 A I couldn't say. I wasn't aware of her prior.

04:35:19 15 Q Is there anything else you know about her that
04:35:21 16 you haven't told me? Like, what does she -- do you
04:35:24 17 follow her posts or social media?

04:35:27 18 A I have personally never heard of her.

04:35:30 19 Q Okay. Is this the -- so you ran into her in
04:35:34 20 court.

04:35:35 21 Was that before this friends of Sonstar and
04:35:40 22 Daystar meeting?

04:35:41 23 A I couldn't say, because I don't remember what
04:35:42 24 court date it was.

04:35:43 25 Q Okay. And you are saying you don't even

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04:35:45 1 remember this actual meeting?

04:35:47 2 A No, I don't.

04:35:48 3 Q Do you remember ever being in a Zoom or being
04:35:53 4 with Tia other than when you saw her in court?

04:35:56 5 A On a Zoom? No.

04:35:57 6 Q What about any setting other than court?

04:36:00 7 A No. I don't recall having any meetings with
04:36:03 8 her like that.

04:36:10 9 Q And you are saying you don't even remember
04:36:11 10 this --

04:36:12 11 A Right.

04:36:12 12 Q -- friends of Sonstar. Putting aside the
04:36:16 13 date, this June date, were you on other Zoom calls,
04:36:25 14 regular calls, conference calls -- any kind of
04:36:27 15 communication with groups of people who were supporting
04:36:33 16 Tory?

04:36:34 17 A There were some emails. There would be like a
04:36:37 18 blast from Unite The People when something got filed,
04:36:40 19 and they would send the documents. So I was, like, cc'd
04:36:43 20 in on those emails.

04:36:44 21 Q On those groups.

04:36:45 22 What was it -- that group chat have a name?

04:36:47 23 A It was an email -- no. It was just an email
04:36:51 24 with the different people whoever they were sending it
04:36:54 25 to.

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04:36:54 1 Q Uh-huh. And, as far as you can recall, you
04:36:59 2 never attended any meetings, either virtual or in
04:37:02 3 person, of the friends of Sonstar and Daystar?

04:37:05 4 A No. I don't recall that.

04:37:06 5 Q Okay. Did you ever get briefings or updates
04:37:14 6 or intel on what was coming up with the legal strategy?

04:37:17 7 A No.

04:37:20 8 Q What positions they were going to take on
04:37:21 9 things? What they were going to be telling the media?
04:37:24 10 Anything like that?

04:37:25 11 A No. I would just -- after things were
04:37:27 12 published, after they did whatever they did, we would
04:37:30 13 get an email with the paperwork. And then, if it was
04:37:34 14 big enough, that's when Ceasar would come on my
04:37:37 15 Instagram to talk about it, to try to help the audience
04:37:40 16 understand what was taking place at that time.

04:37:42 17 Q Okay. And the origin -- whatever the thing
04:37:44 18 was that was coming out with, that was from these
04:37:47 19 emails?

04:37:48 20 A Yes.

04:37:53 21 Q And that -- that -- the source of that was
04:37:55 22 somebody from Unite The People?

04:37:56 23 A Yes.

04:38:01 24 Q Okay. And as far as you know, is Unite The
04:38:02 25 People still involved with Tory's case?

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04:38:05 1 A I don't know what they're doing.

04:38:06 2 Q And they're not involved with your case?

04:38:08 3 A No, not anymore.

04:38:12 4 Q And is the reason that they stopped being

04:38:14 5 involved -- it's just a money reason?

04:38:17 6 A From my understanding.

04:38:19 7 Q It was their choice, not yours?

04:38:21 8 A Yes, their choice.

04:38:23 9 Q Are you still on those emails from Unite The

04:38:28 10 People about what is coming out on the Tory defense?

04:38:31 11 A No.

04:38:33 12 Q Did you -- did you unsubscribe to that, or

04:38:35 13 they just stopped?

04:38:36 14 A They just stopped sending it. Or I don't know

04:38:39 15 even know if there was an update to even give, but I

04:38:42 16 haven't received anything in a long time.

04:38:44 17 Q Who were the other people that you know

04:38:46 18 personally who were in that -- that group, that got

04:38:50 19 updates from Unite The People about the Tory case?

04:38:54 20 A Tia is the only person I know. Other than

04:38:56 21 that, I don't know the other people. They chose them.

04:38:59 22 Q And could you see from the emails how big a

04:39:02 23 group it was?

04:39:05 24 A No. I could just see that there were other

04:39:07 25 names listed.

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04:39:08 1 Q Okay. Were you in touch during this same
04:39:18 2 period with anybody in the same way from Megan's team?
04:39:22 3 Like, giving you here is what we're going to say, here
04:39:26 4 is what we're going to do, put this on your show?
04:39:28 5 A No.
04:39:29 6 Q No. Okay. Next --
04:39:47 7 MS. HAYRAPETIAN: Do we want a break now?
04:39:49 8 MR. O'SULLIVAN: Yes.
04:39:49 9 THE VIDEOGRAPHER: The time is 4:39. We're
04:39:51 10 going off the record.
04:39:59 11 (Recess was taken.)
05:08:10 12 THE VIDEOGRAPHER: The time is 5:08. We're
05:08:13 13 back on the record.
05:08:19 14 MR. O'SULLIVAN: 61. For the record, I marked
05:08:42 15 as Exhibit 61, a October 29, 2024, communication from
05:08:49 16 Quinn Emanuel directed to Ms. Cooper from Alex Spiro at
05:08:55 17 Quinn. Title is "Notice of Claims and Preservation of
05:08:58 18 Documents and Information."
05:08:59 19 (Exhibit 61 was marked for identification.)
05:08:59 20 BY MR. O'SULLIVAN:
05:09:00 21 Q And did you spend enough time flipping through
05:09:02 22 it, Ms. Cooper, to let me know if you've seen this
05:09:05 23 before?
05:09:06 24 A Yes.
05:09:06 25 Q Okay. Did you review it when you got it?

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05:09:08 1 A Yes.

05:09:08 2 Q And did you understand one of the things that

05:09:10 3 was being -- you were put on notice here is not to

05:09:15 4 delete any documents or emails or anything; right?

05:09:17 5 A Right.

05:09:18 6 Q And did you follow that instruction?

05:09:19 7 A Yes.

05:09:20 8 Q Okay. Have you looked at this document since

05:09:29 9 you first got it -- 61?

05:09:33 10 A No. Not really.

05:09:37 11 Q How did you receive this? By email?

05:09:38 12 A By email.

05:09:39 13 Q And when you got it, what did you do, if

05:09:43 14 anything, about this?

05:09:46 15 A Nothing. I just --

05:09:48 16 Q You said "okay." It says "We're going to sue

05:09:49 17 you, and you better not delete any documents"; right?

05:09:51 18 A Right.

05:09:52 19 Q And did you tell your husband?

05:09:57 20 A About the lawsuit?

05:09:58 21 Q Yeah.

05:09:58 22 A Yes.

05:09:59 23 Q All right. Who else tells did you tell?

05:10:00 24 A The public.

05:10:02 25 Q All right. You talked about it on your show,

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05:10:04 1 what, that day?

05:10:08 2 A Yes.

05:10:09 3 Q And anybody else you reached out to about
05:10:10 4 this?

05:10:12 5 A It was -- no. I just went public with it.

05:10:15 6 Q Did you let Sonstar know that this happened?

05:10:21 7 A The news spread really, really quickly; so I
05:10:25 8 don't know how he found out.

05:10:27 9 Q But pretty quickly he -- everyone knew. Yeah?

05:10:30 10 A Yeah, yeah.

05:10:30 11 Q Okay.

05:10:46 12 MR. O'SULLIVAN: 62. I'll give you that.

05:10:56 13 (Exhibit 62 was marked for identification.)

05:10:57 14 BY MR. O'SULLIVAN:

05:10:57 15 Q For the record, I've marked as Exhibit 62
05:11:00 16 Forensic Analysis of iPhone. This is an FTI document,
05:11:07 17 and it has a report on their forensic analysis of your
05:11:10 18 phone.

05:11:19 19 A Uh-huh.

05:11:20 20 Q And I just want to direct your attention to
05:11:22 21 where it talks about -- let me see. Maybe Marie will
05:11:26 22 show me where the relevant part is.

05:11:29 23 Okay. All right. If you look at page 5 of 5
05:11:38 24 the last page.

05:11:39 25 You see that?

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05:11:47 1 A Uh-huh.

05:11:47 2 Q Those bullets there?

05:11:48 3 A Yes.

05:11:49 4 Q Okay. And based on their forensic analysis,

05:11:55 5 they have these bullets. The first one says that there

05:11:57 6 was evidence that identified the WhatsApp was

05:12:00 7 uninstalled at the time they got your phone; is that

05:12:04 8 correct?

05:12:04 9 A Uh-huh. I believe so.

05:12:04 10 Q Did you uninstall WhatsApp at some point or

05:12:07 11 take it off?

05:12:08 12 A Yeah. I have uninstalled it over the years.

05:12:10 13 Q Okay. Was there a time when you used it?

05:12:12 14 A Yes.

05:12:13 15 Q And what did you use it for? Phone calls?

05:12:17 16 Texting.

05:12:18 17 A No. Sonstar went out of town, and he asked me

05:12:20 18 if I could use WhatsApp to speak with him.

05:12:23 19 Q 'Cause it's free when you are traveling

05:12:25 20 internationally or --

05:12:26 21 A I don't know how that works. But he asked me

05:12:29 22 to talk to him.

05:12:31 23 Q Did you use that to call him or to text him

05:12:33 24 instead of --

05:12:34 25 A Yeah. He needed -- he was out of town. And

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05:12:36 1 yeah.

05:12:37 2 Q Anyway. So you ended up using WhatsApp for

05:12:39 3 the first time because he suggested that's a better

05:12:41 4 platform for whatever he wanted to do?

05:12:44 5 A It wasn't necessarily the first time, but like

05:12:45 6 in a way that -- you know.

05:12:47 7 Q To really communicate in real time?

05:12:49 8 A Yeah, yeah.

05:12:50 9 Q Okay. And that was the only reason you did

05:12:51 10 it?

05:12:53 11 A That was -- yeah. That was the reason why.

05:12:56 12 Q Okay. And it looks like between

05:12:59 13 July 4th, 2023, and March 18 of 2025 your WhatsApp was

05:13:04 14 at least tapping into Wi-Fi.

05:13:05 15 Any reason to think that's not accurate?

05:13:10 16 A No.

05:13:11 17 Q Is March 18, 2025, when you discontinued

05:13:15 18 WhatsApp?

05:13:18 19 A I couldn't say the exact day.

05:13:20 20 Q Approximately?

05:13:20 21 A I couldn't say.

05:13:21 22 Q Was it this year?

05:13:24 23 A That I stopped using it?

05:13:25 24 Q Let me step back.

05:13:26 25 Is there a reason you stopped using WhatsApp?

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05:13:28 1 Or your WhatsApp stopped communicating with the service?

05:13:33 2 A Because it's not something I use routinely.

05:13:35 3 There have been times over the years where I've

05:13:37 4 uninstalled it, because I'll do that with apps and

05:13:39 5 things like that. And then there's been certain people

05:13:43 6 like Sonstar who needed to communicate; so I've used it

05:13:45 7 for that.

05:13:46 8 And then there was an instance -- there was

05:13:48 9 someone reaching out to me that I didn't want to speak

05:13:50 10 to.

05:13:54 11 Q Okay. And when was that incident?

05:13:57 12 A It was this year. I don't know the exact

05:13:59 13 date.

05:14:00 14 Q And -- and is the reason that you uninstalled

05:14:07 15 WhatsApp now -- I know you said you've done it before.

05:14:08 16 When you did it this time, it was because this person

05:14:11 17 reaching out was reaching out on WhatsApp?

05:14:13 18 A Yeah.

05:14:13 19 Q And you didn't want to deal with it; so you

05:14:13 20 thought I'll just deleted the whole app?

05:14:15 21 A I uninstalled the app.

05:14:19 22 Q Uninstalled the app.

05:14:19 23 And who was the person that was reaching out?

05:14:21 24 A Her nickname is Cupcake. Her real name -- I

05:14:24 25 don't remember it right now.

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05:14:26 1 Q And why did you not want to communicate with
05:14:28 2 Cupcake?

05:14:30 3 A Because we had a bad interaction. We had some
05:14:35 4 negative interaction; so I don't -- I don't wish to talk
05:14:37 5 to her.

05:14:38 6 Q Okay. And what was, from her side, the
05:14:40 7 negativity? What did she do that made you no longer
05:14:43 8 want to talk to her? Was it something online?

05:14:46 9 A Yeah. She had been speaking negatively about
05:14:49 10 me online.

05:14:51 11 Q And what was the worse thing she said about
05:14:53 12 you -- Cupcake?

05:14:57 13 A It wasn't the worst. It was just stupid
05:15:00 14 things. You are fat, or you are not big -- or I
05:15:04 15 couldn't tell all of what she said. She did interviews
05:15:07 16 and stuff like that.

05:15:08 17 Q What was the thing that stung the most? Or
05:15:10 18 you said you know what, I'm going to take five minutes
05:15:12 19 and uninstall this app because I don't even want to deal
05:15:15 20 with this person?

05:15:16 21 A Her reaching out to me period because I felt
05:15:18 22 harassed at that point. She's lied before about me
05:15:21 23 going to the courthouse. There was a rumor that I would
05:15:22 24 be in trouble if I went to the courthouse for the
05:15:26 25 Tory Lanez trial that she started, and just stuff that I

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05:15:29 1 felt like was just too far.

05:15:32 2 Q So she was, like, a voice online saying
05:15:34 3 negative things about you, and then she reached out?
05:15:35 4 Like, she sent you a WhatsApp message?

05:15:39 5 A Yes, she did.

05:15:40 6 Q And what was -- what did she say? "Want to
05:15:42 7 hang out"?

05:15:43 8 A I don't recall exactly what she said. But
05:15:44 9 she -- she reached out to me, and I just felt like it
05:15:46 10 was harassing at that point.

05:15:49 11 Q Okay. And so -- so you got rid of WhatsApp.
05:15:52 12 And have you had any interaction with Cupcake
05:15:55 13 since then?

05:15:56 14 A No.

05:15:57 15 Q And has Cupcake continued to say negative
05:16:00 16 things about you online?

05:16:01 17 A I'm not sure.

05:16:02 18 Q Okay. You are not aware either way?

05:16:03 19 A Right. No.

05:16:04 20 Q Okay. And the fourth bullet, "Evidence was
05:16:12 21 identified showing thousands of SMS images were deleted
05:16:15 22 between December 11th, 2019, and April 9, 2025."

05:16:19 23 So you talked before about the different
05:16:24 24 people have different, like, settings and things about
05:16:26 25 auto delete and invisible and whatever.

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05:16:28 1 What's your sort of settings in terms of how
05:16:34 2 your messages and your different platforms are -- are
05:16:37 3 kept? Do you have any auto deletes turned on?
05:16:40 4 A For some things, yes.
05:16:41 5 Q All right. Which of the ones that you -- you
05:16:43 6 keep everything -- which ones -- auto delete. I just
05:16:46 7 want to go through the places stuff might be.
05:16:49 8 A The iPhone may be on auto delete.
05:16:51 9 Q All right. So on iPhone, this is referring to
05:16:54 10 SMS messages deleted.
05:16:56 11 That's your text messages; right?
05:16:58 12 A Are you asking me if I deleted message? Or
05:17:00 13 what are you saying?
05:17:01 14 Q I think this says you definitely did -- or
05:17:03 15 your phone did. Yeah. I'll ask you that.
05:17:06 16 Over time, do you delete messages on iPhone?
05:17:08 17 A Yes.
05:17:09 18 Q Okay. And this says thousands between the
05:17:12 19 long period of time.
05:17:14 20 A Right.
05:17:14 21 Q Any reason to think that's not accurate?
05:17:17 22 A No.
05:17:17 23 Q Okay. And do you sometimes delete messages,
05:17:23 24 like, as you are going? Selectively? Like, I don't
05:17:26 25 need this and just delete it?

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05:17:27 1 What's your -- what's your approach on
05:17:29 2 preserving or deleting SMS messages on your phone?

05:17:33 3 A So I'm one of those people that hates to see
05:17:36 4 that notification saying that you have some messages; so
05:17:40 5 I'll go in and look at it, and if I feel like it's not
05:17:43 6 something worth keeping, then I'll delete it after a
05:17:45 7 while. Or group chats, or stuff like that, I'll delete.

05:17:49 8 Things that just have to -- like, are
05:17:53 9 deadweight so to speak maybe on the phone.

05:17:55 10 Q So one reason you would delete stuff is
05:17:57 11 just -- just, why keep it. I don't need this for
05:18:00 12 anything; right?

05:18:01 13 A And sometimes, over time, for space. I'm
05:18:04 14 recording a lot and streaming a lot. I have to use my
05:18:06 15 devices to blog; so I need space, videos, pictures. I'm
05:18:10 16 taking thousands of pictures and videos and making slide
05:18:14 17 shows, a lot of different things.

05:18:23 18 Q Okay. And do -- do you recall having done
05:18:26 19 that before saying, oh, my God. I need more space. Let
05:18:28 20 me just go get rid of some stuff?

05:18:31 21 A Yes.

05:18:31 22 Q Including messages?

05:18:32 23 A Yes.

05:18:32 24 Q So you've deleted messages just because you
05:18:34 25 needed space?

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05:18:35 1 A Yes.

05:18:37 2 Q But, presumably, you did that knowing the
05:18:40 3 things I'm deleting, I probably don't need; right?

05:18:43 4 A Right.

05:18:43 5 Q Okay. And it says evidence that there was a
05:18:54 6 restoration and the backup March 10, 2025.

05:18:57 7 Was that as part the -- the -- this case, of
05:19:00 8 giving the phone for discovery?

05:19:03 9 A Doing a backup?

05:19:04 10 Q Did you restore your phone from a backup in
05:19:06 11 March?

05:19:07 12 A I may have.

05:19:07 13 Q Or get a new phone maybe?

05:19:09 14 A No. But a backup.

05:19:11 15 Q Okay.

05:19:12 16 A Yeah.

05:19:12 17 Q Have you -- strike that.

05:19:24 18 Have you ever deleted messages related to
05:19:39 19 Megan? Meaning, you looked at a message and it related
05:19:44 20 to Megan in some way, and you got rid of it?

05:19:48 21 A No. If I was sent a message, if I felt like
05:19:52 22 it was important -- you never know what you might need
05:19:55 23 to refer back to; so I try my best to keep it, if I feel
05:19:59 24 like it's important.

05:19:59 25 Q You go the other way. You would rather keep

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05:20:01 1 it so you have it if you need it? Yes.

05:20:03 2 A Yeah, yeah.

05:20:04 3 Q Okay. Did you ever, on purpose, delete any

05:20:09 4 messages because they related to this case, and you

05:20:13 5 didn't want to deal with them in the case?

05:20:16 6 A No.

05:20:17 7 Q Okay.

05:20:17 8 MR. O'SULLIVAN: All right. So this is 62?

05:20:17 9 THE COURT REPORTER: 63.

05:20:46 10 MS. DIXON: I don't think I have it.

05:20:49 11 MR. O'SULLIVAN: Here you go.

05:20:49 12 MS. DIXON: Thank you.

05:20:49 13 MR. O'SULLIVAN: Sorry.

05:20:53 14 MS. DIXON: This is 63.

05:20:56 15 MR. O'SULLIVAN: 63.

05:20:56 16 For the record, I've marked as Exhibit 63 -- I

05:21:00 17 think this is from Ms. Cooper's production -- it's a

05:21:04 18 screenshot. And from the metadata, I can see it's from

05:21:09 19 November of 2024.

05:21:11 20 (Exhibit 63 was marked for identification.)

05:21:11 21 BY MR. O'SULLIVAN:

05:21:11 22 Q And I'll ask you to look at Exhibit 63,

05:21:14 23 Ms. Cooper, and tell me if you recognize that.

05:21:17 24 A Yeah.

05:21:18 25 Q And can you just interpret what's -- what's

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05:21:19 1 going on here for me.

05:21:21 2 A It says, "Recently deleted."

05:21:23 3 Q All right. And I think this is from November

05:21:24 4 of 2024. It -- do you know why you took a screenshot of

05:21:32 5 this page?

05:21:34 6 A No. Honestly, I don't.

05:21:36 7 Q Do you remember the occasion when you did

05:21:40 8 whatever these deletions are?

05:21:43 9 A No, not really. Honestly.

05:21:45 10 Q Was anything going on around

05:21:46 11 November 14th of 2024 that would have caused you to

05:21:53 12 want to delete all this stuff?

05:21:55 13 A November is when I do a trip every year.

05:21:58 14 Q Okay.

05:21:59 15 A So I have to edit a lot, because I do like a

05:22:03 16 mock reality show; so --

05:22:10 17 Q Okay. Do you think that these deletions are

05:22:12 18 related to the mock reality show?

05:22:17 19 A These messages?

05:22:18 20 Q Yeah.

05:22:18 21 A Oh. Like, why I may have needed space?

05:22:20 22 Q Well, I just want to get your testimony.

05:22:22 23 Do you think that the deletions that are on

05:22:24 24 Exhibit 63 -- what do you think the explanation is? The

05:22:29 25 reason that they were deleted.

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05:22:30 1 I think you are about to tell me that maybe
05:22:33 2 you were creating space for -- for your show?
05:22:34 3 A I wouldn't say for certain. You just asked me
05:22:37 4 what was kind of going on around that time. I don't --
05:22:39 5 I don't know why.
05:22:41 6 Q All right. Can you think of -- or do you know
05:22:52 7 the reason why you deleted specifically that first
05:22:55 8 script, the four messages from Sonstar?
05:22:59 9 A I don't know what they are; so no.
05:23:03 10 Q Do you recall ever specifically deleting
05:23:06 11 messages from Sonstar?
05:23:09 12 A No.
05:23:11 13 Q I'm trying to distinguish routine -- I'm just
05:23:14 14 trying to create space, and I'm deleting all of this
05:23:17 15 stuff. I understand that.
05:23:18 16 Was there ever an occasion where you said,
05:23:19 17 "Oh, I should delete these messages from Sonstar" for
05:23:23 18 any reason?
05:23:23 19 A No.
05:23:25 20 Q Is there something about this -- this four
05:23:30 21 message sources that -- that gives you insight as to --
05:23:35 22 as to how you chose this -- this group to delete?
05:23:38 23 A The only one that I would highlight is the --
05:23:42 24 the 20,451. That group chat we -- me and that group of
05:23:49 25 friends were no longer associated with some of the

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05:23:52 1 people in it; so that turned into a dead conversation,
05:23:55 2 basically.

05:23:57 3 Q All right. And how long were you in that
05:23:59 4 group chat?

05:24:00 5 Is that what that is -- a group chat?

05:24:04 6 A For a while. Yeah, yeah. That was a group
05:24:07 7 chat.

05:24:07 8 Q And that's the one that's N-word Shore; right?

05:24:08 9 A Yes.

05:24:11 10 Q What brought that group together? What was
05:24:12 11 your -- your organizing theme?

05:24:16 12 A They're friends of mine. It's just a group of
05:24:18 13 friends, and we have a -- travel together, hung out
05:24:21 14 together, and stuff like that.

05:24:24 15 Q And that's -- what period of time do you think
05:24:28 16 was covered by 20,000 messages? That's a lot of
05:24:33 17 messages.

05:24:33 18 A I don't know. Right. I don't know. It's so
05:24:36 19 much.

05:24:38 20 Q Is -- is anybody in that group related to
05:24:43 21 whatever is going on between you and
05:24:46 22 Megan Thee Stallion?

05:24:47 23 A No.

05:24:48 24 Q All right. Is that -- is -- is either Megan
05:24:52 25 or of Tory Lanez a topic in this N-word Shore chat

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05:24:57 1 group?

05:24:57 2 A No. It's a personal chat.

05:24:58 3 Q All right. It had nothing to do with --

05:25:00 4 A Right. No, no.

05:25:01 5 Q Oh, okay. What about this 475 number? Do you

05:25:04 6 know who that is?

05:25:05 7 A I don't recognize it at this time.

05:25:07 8 Q Okay. 34 messages. A nobody to you.

05:25:09 9 How about Justin? Do you know who that is?

05:25:11 10 A I do know who that is.

05:25:13 11 Q You do?

05:25:14 12 A Uh-huh.

05:25:14 13 Q Okay. And who is that? Just a friend?

05:25:15 14 A He is a social media user that I -- I've

05:25:18 15 spoken to him, and he was supposed to come to an event

05:25:21 16 of mine, but he didn't; so I've never met him in person.

05:25:24 17 We were, like, trying to build a friendship.

05:25:27 18 We were cool.

05:25:28 19 Q Okay. And then I wanted to ask you, so the --

05:25:33 20 you said you have a some kind of retreat and then a

05:25:36 21 reality event; right?

05:25:38 22 A Uh-huh.

05:25:39 23 Q Let me just get that. So what's the -- what's

05:25:42 24 the reality show event?

05:25:45 25 A So I host something called "Camp Mob."

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05:25:48	1	Q	Camp Mob?
05:25:49	2	A	Yes.
05:25:50	3	Q	Okay. Where is that?
05:25:52	4	A	In Houston.
05:25:53	5	Q	Okay. And how often does that happen?
05:25:56	6	A	Annually.
05:25:57	7	Q	And how long have you been doing that?
05:25:59	8	A	Since maybe 2018.
05:26:03	9	Q	Okay. And how big a group is that?
05:26:05	10	A	50 or less.
05:26:06	11	Q	All right. And where do you have it?
05:26:08	12	A	In Houston.
05:26:09	13	Q	In a -- In a campsite or a hotel?
05:26:11	14	A	I'm sorry. The people attending book their
05:26:14	15		own rooms.
05:26:15	16	Q	Okay.
05:26:15	17	A	Wherever they wish. They come to the
05:26:17	18		locations based on the activities we're going to do, and
05:26:20	19		that's how it goes.
05:26:21	20	Q	All right. And the activities are just around
05:26:22	21		town or?
05:26:23	22	A	Yes.
05:26:23	23	Q	Public space?
05:26:24	24	A	Yes.
05:26:25	25	Q	And what would you say is the organizing theme

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05:26:28 1 there? What do you generally -- what brings -- what
05:26:30 2 causes people to want to come to that?

05:26:33 3 A To meet me.

05:26:35 4 Q Okay.

05:26:36 5 A And then it goes on for about three days, so
05:26:38 6 it's a time to not bond. All of the people coming, are
05:26:43 7 fans of the show; so they have at least that in common.
05:26:46 8 So it's just a bonding-type thing, a fun thing.

05:26:49 9 Q And you said it's less than 50 people?

05:26:52 10 A Yes, it changes. It depends on the year. But
05:26:55 11 yes, less than 50.

05:26:56 12 Q How about this year? Did you already have it?

05:26:58 13 A No. It's every November. It's the same time
05:27:00 14 frame every year.

05:27:00 15 Q All right. So November of '24 -- okay?

05:27:02 16 A Uh-huh.

05:27:03 17 Q How many people showed up last year?
05:27:07 18 Approximately?

05:27:08 19 A Between 30 and 40 maybe.

05:27:10 20 Q All right. And did people come from, like,
05:27:12 21 out of state to go to that?

05:27:13 22 A Yes.

05:27:19 23 Q Are any of the names we've talked about today
05:27:20 24 related to the Tory and Megan thing in that 30 to 40
05:27:24 25 people who come?

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05:27:25 1 A No.

05:27:30 2 Q Okay. What were the main -- well, have --
05:27:37 3 has -- has Megan and your -- your -- back-and-forth
05:27:42 4 you've had with her over time been a topic at Camp Mob?

05:27:48 5 A No. I actually am very strict in the way that
05:27:53 6 it is about nothing more than us bonding; so I make it
05:27:56 7 about us doing activities. And entertainment news is
05:27:59 8 not allowed, actually.

05:28:00 9 Q All right. So you banned that. You can't
05:28:02 10 talk about.

05:28:02 11 What can't you talk about at Camp Mob?

05:28:05 12 A What I call "work"; so anything that's
05:28:07 13 supposed to be trending, any gossip, I don't want to
05:28:11 14 hear it. I want to bond. I want to get to know some of
05:28:13 15 my fans and see what interests them and play games. And
05:28:16 16 we do team building and things and stuff like that.

05:28:18 17 Q Okay. And then what was -- the other one is a
05:28:25 18 reality show type of thing.

05:28:28 19 A Like, a parody.

05:28:29 20 Q A parody reality show.

05:28:30 21 And is that every year?

05:28:33 22 A It's not every year, but I've done it in the
05:28:36 23 last few years.

05:28:36 24 Q Okay. And when was that most recently?

05:28:41 25 A So I recorded some things in 2024. I didn't,

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05:28:44 1 ultimately, put them out.

05:28:47 2 Q Okay. And you recorded some things from --
05:28:53 3 from an actual event, a get-together? What does it
05:28:57 4 mean? What did you record, generally?

05:28:59 5 A Yeah. So, as we're doing our activities and
05:29:02 6 stuff like that -- so we went to a -- we went to a room
05:29:07 7 where you can hit things. It's an activity where you
05:29:09 8 kind of let off steam and hit things. So I'm recording,
05:29:11 9 like, the cameras. I'm recording the people arriving.
05:29:13 10 I'm recording, like, how do you feel? Have you been
05:29:17 11 enjoying yourself so far -- "confessional" --
05:29:19 12 quote/unquote -- style-things like that, where I kind of
05:29:21 13 play a producer and then film them.

05:29:23 14 Q And how do the people who you are filming get
05:29:25 15 there? Like?

05:29:27 16 A Of their own recognizance. They'll fly in or
05:29:31 17 drive in or somewhere local.

05:29:32 18 Q All right. And -- and is it -- is it a
05:29:33 19 different group than the Camp Mob group?

05:29:36 20 A What do you mean?

05:29:38 21 Q That the -- what you just -- the filming you
05:29:41 22 talked in 2024, what are you doing -- you went to a
05:29:44 23 place where you hit things.

05:29:44 24 You said that; right?

05:29:46 25 A Uh-huh.

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05:29:46 1 Q Is that different than Camp Mob, or the same?

05:29:48 2 A No. That's a part of it. That's one of the

05:29:51 3 activities we do.

05:29:51 4 Q I see. Okay. So they're related? All right.

05:29:52 5 So within Camp Mob --

05:29:54 6 A Right. We do events. Yeah.

05:29:55 7 Q Got it. Okay.

05:29:56 8 And was there some issue with Camp Mob about

05:30:02 9 somebody getting attacked or assaulted going online?

05:30:05 10 Does that ring a bell?

05:30:07 11 A Yes.

05:30:07 12 Q And what was that? Was that just last

05:30:09 13 November?

05:30:10 14 A No. It was 2023, actually.

05:30:12 15 Q And what was the situation?

05:30:16 16 A In 2023, I had a pajama party.

05:30:19 17 Q Okay.

05:30:19 18 A At an Airbnb. And the day went on. In the

05:30:26 19 following days, it was brought to my attention an

05:30:29 20 allegation that a couple of guys, three different guys

05:30:31 21 had been touched on the behind by one particular person.

05:30:36 22 Q Like, grown-ups? Everyone is a grown-up?

05:30:38 23 A Yes.

05:30:39 24 Q Okay. And, what -- those individuals came to

05:30:45 25 you and said, "Someone is touching me"?

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05:30:46 1 A No. We were on STATIONHEAD, so I was speaking
05:30:50 2 on the event, da, da, da. And then in the chat, it was
05:30:53 3 brought up, and then I then brought those people up on
05:30:56 4 air and asked, "Wait, what happened?" And that's when
05:30:59 5 it was revealed to me.

05:31:01 6 Q And literally what did they -- what was the
05:31:02 7 complaint? Or what was the accusation?

05:31:05 8 A They said that a man named Jordan had touched
05:31:07 9 their behinds.

05:31:09 10 Q Okay. Three different people had the same
05:31:12 11 experience?

05:31:12 12 A Yes.

05:31:13 13 Q And what happened after that? Was Jordan --

05:31:17 14 A I found out later. So, by the time I found
05:31:19 15 out, the trip was basically over because it was only,
05:31:23 16 like, three days. And, you know -- but, like I said, by
05:31:27 17 the time I found out, it was basically over with.

05:31:30 18 Q And did you deal with Jordan?

05:31:33 19 A I spoke to the different guys and asked them
05:31:37 20 if they wanted to pursue anything, how they felt about
05:31:39 21 it. And there were three men. They were kind of
05:31:42 22 embarrassed was my impression. And I think they just
05:31:46 23 didn't want to be looked at a certain way, or I don't
05:31:48 24 know all of their reasons, but they didn't want to move
05:31:51 25 forward, they said, you know.

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05:31:52 1 And Jordan apologized. He sent me an email,
05:31:54 2 and he apologized to me, and he felt like he had ruined
05:31:58 3 my event. And he apologized to those three individuals
05:32:00 4 by name, and said, "I'm sorry for touching you
05:32:03 5 inappropriately."
05:32:04 6 Q Okay. And is Jordan in or out for the future?
05:32:10 7 A He is out.
05:32:11 8 Q Out.
05:32:11 9 A Yes.
05:32:12 10 Q Okay. All right.
05:32:16 11 I'm going to go back to 63 for a second and
05:32:48 12 just ask you a couple of questions about this group
05:32:50 13 N-word Shore.
05:32:50 14 A Uh-huh.
05:32:50 15 Q You said at some point the friends you had in
05:32:54 16 there stopped being in there.
05:32:55 17 Is that what you had stopped being associated?
05:32:59 18 A All of us are no longer friends. So some of
05:33:01 19 the people in the chat are no longer a part of the
05:33:04 20 friend group.
05:33:07 21 Q And how would you describe the reason that
05:33:08 22 group was together and then decided not to be together?
05:33:12 23 What was the cause?
05:33:13 24 A The group was about -- I'm going off how many
05:33:21 25 people are in it.

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05:33:22 1 Q Actually, I should ask that. How many
05:33:23 2 roughly? Not exactly. More than 100?
05:33:25 3 A Okay. No, no, no. This is a small group of
05:33:27 4 friends.
05:33:27 5 Q Okay. Less than 10?
05:33:28 6 A Yeah, less than 10, for sure.
05:33:30 7 Q So just tell me who was in that.
05:33:33 8 A Me, a friend of mine named Stevey.
05:33:37 9 Q How do you spell that?
05:33:38 10 A S-T-E-V-E-Y.
05:33:41 11 Q Stevey -- Stevey (pronouncing)?
05:33:41 12 A She says Stevey. Yup. Uh-huh. Kimani.
05:33:46 13 Q Do you know Stevey's last name?
05:33:49 14 A I have -- I have to look it up elsewhere. I
05:33:51 15 don't know right offhand.
05:33:52 16 Q You don't know. Okay.
05:33:53 17 What about Kimani's last name?
05:33:56 18 A Oh, I have to get that. I don't know.
05:33:58 19 Q Do you have that somewhere you can easily look
05:34:00 20 it up?
05:34:01 21 A I believe I can get that. Yeah.
05:34:02 22 Q Okay. Who else is in that group?
05:34:04 23 A Dynish, D-Y-N-I-S-H.
05:34:08 24 Q Okay. Last name there?
05:34:10 25 A No. I don't know it. I'm sorry.

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05:34:12 1 Q Do you -- do you actually -- like, is that
05:34:15 2 some indication of how well you know them -- that you
05:34:17 3 don't know their last names?

05:34:19 4 A It's not that. It's just we all go by
05:34:21 5 nicknames, and we've been using them so long. I could
05:34:23 6 get it for you, but offhand I really don't know.

05:34:27 7 Q Okay. Who else is in the group? Stevey,
05:34:31 8 Kimani, Dynish?

05:34:33 9 A Kimble.

05:34:34 10 Q Kimble. Okay. Is that a man or a woman?

05:34:37 11 A A man.

05:34:37 12 And then -- I believe in this group -- that
05:34:44 13 might have been about it. Give or take maybe one or two
05:34:47 14 people, but that's about it.

05:34:48 15 Q And when did you -- if we looked back and
05:34:50 16 looked at this group N-word Shore, when do you think it
05:34:53 17 was first established?

05:35:00 18 A Maybe 2020-ish. Maybe. Maybe prior.

05:35:07 19 Q And -- and tell me, as best as you can recall,
05:35:09 20 what brought you together? Like, what was the
05:35:10 21 circumstances of the creation of the N-word Shore?

05:35:11 22 Is "shore" referring to the beach somewhere?

05:35:14 23 A No. It was a place. If you look at the
05:35:16 24 picture associated, it was a play on "Jersey Shore."
05:35:18 25 That's all. And we're all Black; so I called it that.

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05:35:21 1 Q Okay. And I can't see the picture that well.

05:35:23 2 Are you the people in that picture you guys,
05:35:25 3 or the real people from the "Jersey Shore"?

05:35:27 4 A Yeah, the real people from the "Jersey Shore."

05:35:29 5 Q Got it. Okay.

05:35:30 6 A It was a fun group of friends so that was the
05:35:32 7 vibe.

05:35:32 8 Q Got it. Okay.

05:35:32 9 And -- and you -- you -- how did you know the
05:35:39 10 people became part of that group? Like, so I understand
05:35:43 11 the name now.

05:35:44 12 But what -- did you guys go to the beach
05:35:45 13 together? What was the -- what brought you together and
05:35:48 14 then took you apart?

05:35:50 15 A A cousin of mine went to school with one of
05:35:52 16 the people in the group.

05:35:54 17 Q Which one?

05:35:55 18 A Kimble.

05:35:56 19 Q Okay. What's your cousin's name?

05:35:58 20 A My cousin Brittney.

05:36:00 21 Q Okay. Where did they go to school together?

05:36:03 22 A In Galveston. I didn't go to school with
05:36:05 23 them. It was just in Galveston.

05:36:08 24 Q So your cousin Brittney knew Kimble, and
05:36:10 25 Kimble introduced you to the others?

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05:36:12 1 A Justin introduced me to the others.

05:36:15 2 Q All right. Justin is?

05:36:16 3 A The one on that screenshot.

05:36:20 4 Q Okay. Did -- did something specific cause you

05:36:29 5 to delete Justin and the N-word Shore group at the same

05:36:32 6 time 'cause they're the same group?

05:36:34 7 A So Justin used to be a part of our friend

05:36:37 8 group, and Justin and Kimble had romantic dealings, and

05:36:43 9 it got really messy and it was why everybody fell out.

05:36:50 10 Q Okay. Justin was part of the group?

05:36:52 11 A Uh-huh.

05:36:52 12 Q And Kimble was your cousin's friend?

05:36:54 13 A They went to school together. I wouldn't call

05:36:56 14 them friends.

05:36:57 15 Q Okay. School together. And then Justin and

05:36:59 16 Kimble were romantically involved, and then that just

05:37:03 17 created dissension in the group?

05:37:05 18 A Yes.

05:37:06 19 Q And -- well, this was only late last year.

05:37:09 20 So have you -- have you been in touch with any

05:37:13 21 of these people since November of last year?

05:37:15 22 A Yes.

05:37:16 23 Q Okay. So you don't communicate within this

05:37:18 24 chat but --

05:37:21 25 A No.

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05:37:21 1 Q But you're -- on a one-to-one basis, you are
05:37:23 2 still friends with these other people? Besides Justin
05:37:25 3 and Kimble?

05:37:27 4 A I'm still okay with Kimble. We're, like,
05:37:29 5 trying to rebuild. I'm no longer friends with Justin.
05:37:31 6 And then everyone else that you listed -- I'm still
05:37:34 7 friends with them.

05:37:35 8 And then, like, I said, there's one or two
05:37:42 9 people in that group chat that I'm not cool with
05:37:44 10 anymore.

05:37:48 11 Q Okay. And, like, if I was to retrieve all
05:37:50 12 those 20,000 messages, what's in there? Is it just all
05:37:55 13 logistics -- see you Tuesday, meet you at the club, or
05:37:58 14 whatever? Or is there a topic, like Meg or Tory or the
05:38:02 15 stuff we were talking about in there?

05:38:03 16 A No. It's about us. And there were so many of
05:38:06 17 us that it moved so fast. And a lot of reactions to
05:38:10 18 things and just jokey-type stuff. Like I said, it was
05:38:15 19 like a fun group.

05:38:16 20 So we just -- like I said, we had fun
05:38:17 21 together. We would joke a lot. Honestly. And talk
05:38:21 22 about our day and stuff like that. We would wake up
05:38:23 23 every morning -- good morning. What are you doing? Da,
05:38:25 24 da, da. You know, idle chitchat.

05:38:28 25 Q All right. And -- and was Justin the reason

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05:38:30 1 it all kind of came apart?

05:38:31 2 Like, you are -- you are going to stay in
05:38:35 3 contact with the rest of them; right?

05:38:37 4 A I -- I wouldn't put all the blame on Justin,
05:38:39 5 but he was a part of it. It's not all his fault.

05:38:43 6 Q And the -- and the source of the trouble was
05:38:45 7 that he and Kimble were romantically involved, and then
05:38:47 8 they -- they weren't getting along and that affected
05:38:51 9 everyone?

05:38:51 10 A Justin actually -- him and Kimble had some
05:38:55 11 type of romantic dealings. And I think because they
05:38:59 12 were homosexual and maybe did not want everybody in
05:39:02 13 their business, that they were dishonest with us. And
05:39:06 14 that's what kind of caused everybody to feel a way and
05:39:10 15 have an initial conflict, feeling like we were being
05:39:12 16 lied to and want to know, like, what's going on. And
05:39:15 17 feeling left out, basically.

05:39:17 18 Q Did you guys in that group ever talk about the
05:39:21 19 "HBO Max" special about Megan and Tory?

05:39:27 20 A No.

05:39:28 21 Q Do you know what I'm talking about?

05:39:30 22 A Yeah.

05:39:30 23 Q There's a special --

05:39:31 24 A The "Five Shots."

05:39:32 25 Q I don't know.

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05:39:33 1 What is it called?

05:39:34 2 A I believe it was called "Five Shots." The HBO
05:39:37 3 special that I was in.

05:39:38 4 Q Where they had one perspective, and then the
05:39:39 5 other perspective.

05:39:40 6 You've seen that? You were in it; right?

05:39:43 7 A Yeah.

05:39:43 8 Q Okay. And you were -- you were in Tory's --

05:39:46 9 A Yes.

05:39:46 10 Q -- version. Yeah. Okay.

05:39:48 11 But that -- there's no overlap between this
05:39:51 12 that and what these guys talk about here?

05:39:54 13 A Right. No. Those people listen to my show
05:39:56 14 also; so I need a break. So when I get done with work,
05:40:01 15 I don't want to -- I want to talk to my friends.

05:40:05 16 Q Got it.

05:40:06 17 So it's like the Mob Camp. It's, like, we're
05:40:07 18 not talking business here.

05:40:08 19 A Right, right. I just need some time with my
05:40:10 20 friends.

05:40:11 21 Q Got it. Noir King -- was he in that?

05:40:15 22 A In this group chat? No.

05:40:18 23 Q How do you know -- do you know him? Is it a
05:40:20 24 him?

05:40:20 25 A Yes.

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05:40:20 1 Q How do you know Noir King?

05:40:23 2 A I met Noir because, going back to that
05:40:25 3 situation with my children, he helped me to figure out
05:40:27 4 who had done that.

05:40:31 5 Q The Craigslist thing?

05:40:32 6 A Yes.

05:40:32 7 Q And how -- how did he help you? Or why did
05:40:37 8 you think he could help you?

05:40:41 9 A Well -- how did that go? So, I was publicly
05:40:47 10 distraught by it, and I talked about it publicly. And
05:40:50 11 him -- I was in a group, I feel like, with him and two
05:40:57 12 other women. And --

05:41:00 13 Q A chat group?

05:41:00 14 A Yeah.

05:41:01 15 Q Okay.

05:41:02 16 A Yeah. And at the time, they wanted to help
05:41:05 17 me, and so they tried to look into it, like, as much as
05:41:08 18 they could, or go online and try to find out who BRZY
05:41:11 19 was. Like, it was a public thing what BRZY posted to
05:41:14 20 Tasha K.; so we all kind of started there to try to
05:41:17 21 figure out who this guy was and see. So they just
05:41:20 22 helped me in that way.

05:41:21 23 Q And that was -- at the time that happened,
05:41:27 24 then you thought maybe Noir King could help you with
05:41:30 25 that situation, with Craigslist.

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05:41:32 1 But did you already know him? Was he already
05:41:34 2 your friend?
05:41:35 3 A No.
05:41:38 4 Q And did -- did you become acquainted with him
05:41:40 5 because of that situation -- this situation with
05:41:41 6 Craigslist?
05:41:42 7 A Yeah. In a personal way. Uh-huh.
05:41:44 8 Q Okay. And how was it that you connected on
05:41:46 9 that? Did he reach out and say, "Oh, I -- I'm good at
05:41:50 10 investigating these things" or? Like what -- was he a
05:41:53 11 tech guy?
05:41:54 12 A I couldn't say exactly. No. I just think
05:41:56 13 that he was willing to see if he could find anything to
05:41:58 14 help me.
05:41:59 15 Q All right. But was there anything about him
05:42:00 16 that made it seem like he -- he would be good at that?
05:42:04 17 A No. I didn't have any background, but I was
05:42:06 18 willing to get any help I could get, because it was my
05:42:09 19 kids and I was desperate.
05:42:11 20 Q Let him go try. Okay.
05:42:13 21 And so you said, "Sure. Go see what you can
05:42:15 22 find"?
05:42:15 23 A Yes.
05:42:16 24 Q And did he find anything?
05:42:18 25 A I can't say for certain, but I do believe that

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05:42:20 1 they did help me, because I didn't do it all on my own.
05:42:23 2 And I was able to file a report. So I don't recall what
05:42:26 3 he contributed, but I do feel like he helped me.
05:42:29 4 Q Okay. And when you filed the police report,
05:42:38 5 you did or did not have the actual name of the person
05:42:40 6 who did it?
05:42:41 7 A I believe I did.
05:42:42 8 Q Okay. And that -- did you get that from
05:42:44 9 Noir King?
05:42:44 10 A I can't say for certain if I got it from him.
05:42:47 11 Q Do you know how -- how he figured it out? How
05:42:49 12 they figured it out?
05:42:53 13 A The person made music; so I was able to, I
05:42:58 14 feel like, find their name based on their music. So
05:43:01 15 it's something like that, yeah, to get their actual
05:43:03 16 name, I believe.
05:43:04 17 Q So you -- you attached the music to the
05:43:06 18 handle?
05:43:07 19 A Right.
05:43:08 20 Q What was his name -- BRZY?
05:43:08 21 A BRZY Flow.
05:43:09 22 Q BRZY Flow?
05:43:11 23 A Uh-huh.
05:43:12 24 Q And -- okay. And then figured out. So then
05:43:18 25 you went to the police and said, "This person is doing

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05:43:19 1 this thing with Craigslist and my kids"?

05:43:21 2 A Right.

05:43:22 3 Q And -- and did you ever communicate directly
05:43:26 4 with BRZY about it?

05:43:27 5 A No. But I did publicly address it, and the
05:43:32 6 Craigslist ad was removed.

05:43:34 7 Q How quickly was the Craigslist ad removed?

05:43:38 8 A Very quickly after I said I had gone to the
05:43:40 9 police.

05:43:40 10 (The Court Reporter requested clarification.)

05:43:40 11 THE WITNESS: Said that I went to the police
05:43:44 12 on air.

05:43:45 13 BY MR. O'SULLIVAN:

05:43:46 14 Q And how -- how quickly was that after the
05:43:49 15 thing was first -- you first found out about it? Like,
05:43:52 16 how long was it up there, total?

05:43:54 17 A I don't know how long it was up there. It was
05:43:55 18 only brought to my attention by the public message he
05:43:58 19 left for Tasha K. I had no idea about it.

05:44:02 20 Q All right. So -- so he -- BRZY reached out to
05:44:06 21 Tasha K., who you have crossed paths with because of
05:44:09 22 this other situation; right? Right? With the Cardi B.
05:44:13 23 thing; is that right?

05:44:14 24 A We didn't cross paths, but I commented on it.

05:44:16 25 Q Oh, you commented. Right. Exactly. You were

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05:44:17 1 saying -- okay.

05:44:18 2 A Yeah.

05:44:20 3 Q And -- and you said that this person --

05:44:23 4 blogger got in trouble, got sued successfully by

05:44:27 5 Cardi B. And you had that comment that I asked you

05:44:28 6 about which is she handed him the case or gifted him the

05:44:31 7 case?

05:44:32 8 A Handed it to him basically because of her

05:44:35 9 assertion.

05:44:35 10 Q And -- and I'm not sure I understand what you

05:44:37 11 meant by that. That she made it easy for him to -- for

05:44:40 12 her to sue her? What does it mean to hand somebody a

05:44:43 13 case?

05:44:44 14 A I believe that because Tasha K. asserted what

05:44:46 15 she did about Cardi -- she accused Cardi B. of having

05:44:51 16 herpes -- you cannot assert that unless you know for

05:44:53 17 certain.

05:44:54 18 Q Why? Why you assert stuff all the time

05:44:56 19 without knowing? You said Megan lied.

05:44:56 20 A I don't. I --

05:44:56 21 (The Court Reporter requested clarification.)

05:44:56 22 THE WITNESS: I said I pose questions.

05:45:00 23 BY MR. O'SULLIVAN:

05:45:01 24 Q Okay. And you are saying that this -- this

05:45:06 25 blogger crossed the line. Instead of saying I wonder if

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05:45:08 1 so-and-so has herpes, they said she does?

05:45:11 2 A Yes.

05:45:12 3 Q Sort of like he is saying I wonder if she's

05:45:14 4 lying or she's lying?

05:45:16 5 A Right.

05:45:16 6 Q It's a question or an assertion but the same

05:45:19 7 underlying, right, substantive claim?

05:45:22 8 A I don't believe so.

05:45:24 9 Q Okay. Anyway. So this Tasha K. person is

05:45:29 10 approached by?

05:45:31 11 A BRZY.

05:45:31 12 Q BRZY. And BRZY says I have some interesting

05:45:34 13 stuff about?

05:45:35 14 A Me.

05:45:36 15 Q About -- okay. And then what happened? You

05:45:41 16 reach out to Tasha K. and say, "Don't you dare"?

05:45:45 17 A I reached out to Tasha K., and let her know

05:45:47 18 that I'm going to pursue whatever I can and that I don't

05:45:50 19 think that she should listen to that person.

05:45:58 20 Q And did that work?

05:45:59 21 A She didn't post about it.

05:46:00 22 Q Is okay. And how did you get wind that BRZY

05:46:05 23 had approached -- was that all openly on the -- on

05:46:07 24 the --

05:46:08 25 A He went on YouTube and commented publicly and

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05:46:11 1 many people saw it, and that's when they sent it to me.

05:46:14 2 Q BRZY went on YouTube and said, "I have --

05:46:17 3 I have this scandal about Ms. Cooper"?

05:46:19 4 A Yes.

05:46:20 5 Q And I think you Tasha K. should run with it?

05:46:24 6 A Yes.

05:46:27 7 Q Okay.

05:46:33 8 MR. O'SULLIVAN: Well, just tell me what to

05:46:34 9 prioritize. 64. Please. For the record, I've marked

05:47:01 10 as Exhibit 64, a one-page document. It has FTI Bates

05:47:06 11 number 7907.

05:47:08 12 (Exhibit 64 was marked for identification.)

05:47:08 13 BY MR. O'SULLIVAN:

05:47:09 14 Q It has "Tory Lanez" at the top. And I'll just

05:47:17 15 ask you, Ms. Cooper, do you recognize what we've marked

05:47:20 16 as 64?

05:47:22 17 A Yes.

05:47:23 18 Q All right. This came from your production, I

05:47:24 19 think.

05:47:24 20 And what is -- what is this?

05:47:26 21 A This is Tory initially reaching out to me in

05:47:30 22 2020.

05:47:31 23 Q Okay. That -- you talked about that earlier.

05:47:34 24 You said he said --

05:47:35 25 A Uh-huh. Send me your --

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05:47:38 1 (The Court Reporter requested clarification.)

05:47:38 2 THE WITNESS: Send me your number.

05:47:38 3 BY MR. O'SULLIVAN:

05:47:39 4 Q Okay. And this -- this is -- is this -- can

05:47:43 5 the public see this, or is this private?

05:47:45 6 A This is private.

05:47:46 7 Q Okay. And the stuff in the blue -- the blue

05:47:53 8 is you?

05:47:54 9 A Yes.

05:47:55 10 Q Okay. And I think this is one of the

05:48:08 11 documents that we got from FTI?

05:48:11 12 A Okay.

05:48:12 13 Q But not from you. It -- was this deleted on

05:48:16 14 your -- on your phone?

05:48:17 15 A No. This was old. It's from 2020.

05:48:21 16 Q Yeah.

05:48:22 17 A So this was in my messages with Noir, but I

05:48:24 18 didn't have that device, have that actual screenshot; so

05:48:28 19 that's why I didn't have the screenshot, but it's in

05:48:31 20 those messages.

05:48:32 21 Q It says, "I've been dying to know why you

05:48:50 22 asked for my number"?

05:48:52 23 A Right.

05:48:53 24 Q Did you find out?

05:48:54 25 A No. Because, remember, when we got on the

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05:48:56 1 phone, he was occupied; so I still didn't know.

05:48:58 2 Q Okay. And it -- is this the only direct
05:49:10 3 message you have with Tory Lanez on Instagram?

05:49:14 4 A No. There was some more messages associated
05:49:18 5 with that account. That account got suspended -- is why
05:49:22 6 I don't have access to them now.

05:49:24 7 Q On your end, or his end?

05:49:25 8 A Mine. My Milagro Gramz account -- it got
05:49:28 9 suspended; so I don't have access to it now, but I sent
05:49:31 10 them to email, so they're in that group chat. They're
05:49:35 11 in that text message thread.

05:49:37 12 Q Okay. You mean, the text message thread that
05:49:41 13 we looked at with the -- the cut and paste on to the
05:49:44 14 PDF?

05:49:44 15 A No. No. It should literally be in my
05:49:47 16 messages with Noir King, like, in our text. But the
05:49:51 17 device that would have the actual picture -- I don't
05:49:54 18 have that. That's so old. But it should be in our
05:49:56 19 messages, though.

05:49:57 20 Q Okay. Anything else with this?

05:50:02 21 MR. O'SULLIVAN: Okay. 65, please.

05:50:16 22 (Exhibit 65 was marked for identification.)

05:50:16 23 BY MR. O'SULLIVAN:

05:50:17 24 Q Okay. Exhibit 65 is in front of you.

05:50:28 25 Can you tell me what this is?

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05:50:30 1 A It's a direct message from Sonstar. There is
05:50:33 2 a screenshot of a story post that they created. They
05:50:38 3 sent it to me. And said, "Hello, Mila, this is Tory's
05:50:43 4 dad, been listening to Mob Radio. I would like to talk
05:50:46 5 to you off the record."
05:50:47 6 "Okay. I appreciate you so much and will
05:50:51 7 without a doubt keep my lips sealed, you have my word."
05:50:54 8 Q We're going to test that. What did he tell
05:50:59 9 you off the record? And are you going to unseal your
05:51:02 10 lips and tell me what it is?
05:51:03 11 A Yes.
05:51:04 12 Q Okay. What did he tell you off the record?
05:51:07 13 A So that was leading up to our first call.
05:51:11 14 Q Uh-huh.
05:51:11 15 A When I told you he called and then Tory
05:51:13 16 called. So Sonstar speaks like the Bible. He talk kind
05:51:18 17 of in parables.
05:51:20 18 Q Uh-huh. He's a preacher; right?
05:51:22 19 A Yes.
05:51:23 20 Q Okay.
05:51:23 21 A And so when we were on that call, he kind of
05:51:26 22 hinted that things that, I felt like, spoke to his son's
05:51:32 23 innocence, basically saying, you know, "In due time,
05:51:34 24 we'll see." They weren't certain what would happen
05:51:39 25 next.

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05:51:39 1 So he just said to me, something to the effect
05:51:45 2 of, "Well, the world is going to see." And "time will
05:51:47 3 tell." And, you know, "I've been watching your show,
05:51:51 4 and it's crazy what you've concluded." And just to kind
05:51:55 5 of stay tuned, and that he would let me know if it were
05:51:58 6 possible to maybe interview him, 'cause I asked, "Well,
05:52:00 7 can I interview you or what's the point?"

05:52:02 8 And so I asked that in that conversation, and
05:52:05 9 he said he would get back to me, and we did do a
05:52:09 10 subsequent interview off the basis of our call.

05:52:12 11 Q Did he ever explain what the off-the-record
05:52:15 12 part was?

05:52:17 13 A I think that he did not want me to speak to
05:52:20 14 a -- talking to them. I don't think he wanted me to
05:52:24 15 make it public. So I think that, period, just anything
05:52:26 16 he said, I just don't think he wanted the public to know
05:52:29 17 we had touched bases.

05:52:30 18 Q He was okay with you talking about whatever
05:52:32 19 the thing was, but he didn't want you to tell people it
05:52:35 20 was coming from him, or that you were in touch with him
05:52:37 21 on that subject?

05:52:38 22 A Well, he didn't really tell me anything. So,
05:52:40 23 once again, he just wanted to keep it off to the side
05:52:43 24 because he was still trying to figure out what he want
05:52:46 25 to do. 'Cause I'd asked him for a interview and stuff

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05:52:49 1 like that; so --

05:52:50 2 Q So I guess -- of course. So -- so off the
05:52:52 3 record is like a reporter off the record, meaning I'll
05:52:56 4 tell you, but you can't say you got it from me. You
05:52:58 5 can't source it directly to me.

05:52:59 6 A So, for me, when someone says "Off the
05:53:01 7 record," that is my -- the way that I would interpret
05:53:05 8 it; but, for him, I don't know if he looked at it that
05:53:07 9 way because on that call, he didn't give me anything
05:53:10 10 pertinent.

05:53:13 11 Q On that first call?

05:53:14 12 A Right.

05:53:15 13 Q But you did tell him "I'll keep my lips
05:53:18 14 sealed," and he has your word about that?

05:53:19 15 A Right. I was hoping when he hit me that they
05:53:21 16 were ready to do an interview; so I was letting him
05:53:24 17 know, yes, I'm a person that I can have that
05:53:29 18 professionalism with you, and if you are willing, yes,
05:53:32 19 I'm very open to interviewing.

05:53:33 20 Q Okay. And did you -- in your mind, is there
05:53:51 21 anything left between you and Sonstar that's still off
05:53:54 22 the record, meaning is there anything he told you that
05:53:57 23 you didn't turn around and already put out there? Or
05:54:01 24 are your lips still sealed about anything? In terms of
05:54:05 25 your conversations with Sonstar.

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05:54:07	1	A	We had a conversation that I have not made
05:54:10	2		public.
05:54:11	3	Q	All right. When was that?
05:54:13	4	A	In 2021.
05:54:15	5	Q	All right. Tell me about that.
05:54:16	6		Who else was present?
05:54:17	7	A	It was just me and him on the phone.
05:54:20	8	Q	Okay. Who called who?
05:54:22	9	A	I don't recall.
05:54:26	10	Q	Well, what was the subject?
05:54:27	11	A	The alleged incident.
05:54:28	12	Q	The alleged incident meaning Tory and Megan's
05:54:31	13		shooting?
05:54:32	14	A	Yes.
05:54:32	15	Q	And you don't recall who called who.
05:54:34	16		What did you say, and what did he say on this
05:54:37	17		2021 call?
05:54:39	18	A	On this particular day, we chitchatted. And I
05:54:46	19		don't know how we got into it, but -- but yeah. I don't
05:54:47	20		know. At some point, though, he goes into what he heard
05:54:50	21		of the situation.
05:54:57	22	Q	He is telling you things he has heard about
05:54:59	23		the underlying events?
05:55:01	24	A	Uh-huh.
05:55:02	25	Q	And the events are the -- the night that Megan

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05:55:07 1 was shot or was injured. Yeah?

05:55:09 2 A Yes.

05:55:09 3 Q And did he, on this later call, say, "Oh, by
05:55:13 4 the way, remember our off the record deal? Keep this
05:55:15 5 off the record"?

05:55:16 6 A No.

05:55:16 7 Q Did he tell you you needed to keep what he was
05:55:18 8 telling you secret?

05:55:19 9 A No.

05:55:21 10 Q Did he say anything to you about what you
05:55:23 11 might do with the information you were getting? Or why
05:55:28 12 he was telling you then?

05:55:32 13 A I -- once again, I don't remember how we got
05:55:34 14 into that conversation. But, no, he didn't say that I
05:55:38 15 couldn't go out and speak about it, I don't believe.
05:55:40 16 No.

05:55:41 17 Q Okay. And so it's four years later. What was
05:55:43 18 the information that he shared with you that you haven't
05:55:47 19 since shared? Like, what was news or new about it?

05:55:55 20 A It was just basically his proximity because it
05:55:57 21 was Tory's dad. I was interested in hearing what he had
05:56:00 22 to say, but he wasn't there.

05:56:01 23 But you -- what are you asking me?

05:56:03 24 Q I think you said at the beginning of this,
05:56:06 25 there's one conversation that I had with Sonstar that I

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05:56:09 1 reported or talked about, and I'm trying what the
05:56:11 2 substance -- what the information was that was different
05:56:14 3 from all the other conversations.

05:56:15 4 A That it was supposed to be an overview of what
05:56:18 5 happened that night.

05:56:19 6 Q From whose perspective? I mean, the dad
05:56:23 7 wasn't there.

05:56:24 8 A Right. I would assume from his son's -- from
05:56:26 9 Tory's.

05:56:27 10 Q Okay. And, like, was it formal? Was it,
05:56:30 11 like, a slideshow or something? Or was it just --

05:56:31 12 A No. It was just him talking.

05:56:33 13 Q -- him talking and big picture laying out of
05:56:37 14 the narrative of the night from Tory's perspective?

05:56:40 15 A I couldn't say for certain it was from his
05:56:43 16 perspective. I was assuming because who would tell you
05:56:45 17 that. I don't know.

05:56:46 18 Q Was it a -- was it a version that made Tory
05:56:48 19 seem innocent?

05:56:50 20 A Yes.

05:56:51 21 Q Was Tory a shooter in that version?

05:56:54 22 A Actually, he didn't even go that far in the
05:56:57 23 conversation.

05:57:01 24 Q What does that mean?

05:57:03 25 A That based on what he relayed, he didn't get

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05:57:06 1 to that point in the story.

05:57:08 2 Q Okay. He stopped before that?

05:57:10 3 A Right.

05:57:11 4 Q Like, before they got in the car or the truck

05:57:13 5 or?

05:57:15 6 A He -- one of the last things I remember

05:57:18 7 mentioning was that they allegedly had fought.

05:57:21 8 Q Tory and Megan?

05:57:23 9 A No. Kelsey and Megan.

05:57:24 10 Q Okay. But he didn't say anything to you, in

05:57:27 11 terms of Tory's perspective, about whether Tory pulled

05:57:30 12 the trigger?

05:57:31 13 A No.

05:57:31 14 Q Did you ask him?

05:57:33 15 A Yes.

05:57:34 16 Q And did you say he had inside information on

05:57:37 17 that?

05:57:38 18 A You said -- ask me one more time.

05:57:40 19 Q He wasn't there. He doesn't know; right?

05:57:42 20 A Right. Right.

05:57:43 21 Q Did he say he has had a conversation about

05:57:44 22 that with Tory?

05:57:45 23 A Oh, no. I don't believe that he trusted me

05:57:50 24 with that. I think he wanted to leave that with Tory.

05:57:56 25 And not give me the opportunity to relay that

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05:57:58 1 information.

05:57:59 2 Q Okay. So he was -- he was trying to give you
05:58:07 3 information that probably was favorable to his son's
05:58:10 4 situation; right? Is that how you interpreted what he
05:58:13 5 saying?

05:58:13 6 A I just interpreted him as venting and kind
05:58:16 7 of -- like I said, because I don't recall how we got
05:58:19 8 into it. 'Cause there wasn't anything like, oh, call
05:58:22 9 me. We need to talk about this. I don't know how we
05:58:24 10 got into that conversation.

05:58:25 11 But it came about, and he brought it up. And
05:58:27 12 I didn't stop him because I was interested and I wanted
05:58:29 13 to know. And I listened. And before he got to that
05:58:33 14 point, he stopped. And I was, like, well, what
05:58:36 15 happened? You know. And he didn't go further.

05:58:40 16 Q Did he give a reason for that? 'Cause I'm
05:58:43 17 sure if you were going to cover it, you would love to
05:58:45 18 know. Here is headline news: Inside -- inside the
05:58:48 19 vehicle.

05:58:50 20 A Yeah. Like I said, I got the impression that
05:58:52 21 he want to allow Daystar to maybe speak more so to that.
05:58:56 22 The things that he touched on, I felt like related to
05:58:58 23 things that were public already. We had already heard
05:59:01 24 about an alleged fight. Everything he kind of told me
05:59:03 25 we kind of pretty much heard; so anything that I feel

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05:59:05 1 like maybe we hadn't, that he didn't say it.

05:59:08 2 Q Okay. And -- 'cause we started this with you
05:59:10 3 saying there's one conversation with Sonstar I haven't
05:59:13 4 talked about.

05:59:13 5 A Yeah.

05:59:14 6 Q Was there anything new in that conversation?

05:59:17 7 A Yes.

05:59:17 8 Q What? I mean, new, meaning you didn't already
05:59:21 9 know.

05:59:22 10 A That I hadn't heard before. And I don't know
05:59:23 11 it to be true, but just that I had never heard.

05:59:26 12 Q Right.

05:59:26 13 A I had never heard that when Daystar got to the
05:59:31 14 door, that he was greeted by Megan and Kylie with four
05:59:33 15 shots and said, "Welcome to the pussy parlor." I never
05:59:37 16 heard that before.

05:59:39 17 Q Did you hear that at the trial?

05:59:43 18 A I don't believe so.

05:59:44 19 Q Okay. What else?

05:59:46 20 A I -- I feel like -- oh, that Jonathan who was
06:00:00 21 the DaBaby, a rapper, that -- that Tory and Megan had
06:00:06 22 allegedly been having sex, and that Kelsey had to go
06:00:10 23 home for COVID -- I'll tell you what I had heard before.
06:00:13 24 This, I had heard before. That Kelsey -- but he was
06:00:16 25 relaying this -- that Kelsey had to go home for COVID,

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06:00:19 1 and that's when Tory and Megan got closer.

06:00:23 2 Q And the dad is telling you this.

06:00:24 3 Presumably Tory is telling the dad this?

06:00:28 4 A I don't know who told him that, but that's --
06:00:30 5 that's what he told me.

06:00:31 6 Q Circumstantially, who else could it be?

06:00:33 7 A I don't know. Right.

06:00:34 8 Q Okay. But so all this stuff he is telling you
06:00:37 9 is not what happened in the vehicle with the gun, any of
06:00:41 10 that.

06:00:41 11 This is, like, leading up to it?

06:00:43 12 A Right.

06:00:43 13 Q And was there anything in his -- in that call
06:00:47 14 between the two of you about what happened in the
06:00:49 15 vehicle with the gun?

06:00:53 16 A No.

06:00:55 17 Q Did Tory ever talk to you about that?

06:00:56 18 A No.

06:00:57 19 Q Has Tory himself told you anything about that
06:01:04 20 night?

06:01:05 21 A No.

06:01:08 22 Q Okay. Anything else about this 2021 Sonstar
06:01:11 23 call that was -- was -- stood out to you? I was excited
06:01:15 24 because you were saying I've never told anyone about
06:01:17 25 this. Anything else newsworthy for the case there?

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06:01:20 1 A Not for me because it wasn't coming from Tory;
06:01:21 2 so who cares about what -- it's hearsay. So it's not
06:01:27 3 something I reported on. Anything he told me, I -- I
06:01:29 4 didn't go live and report on that.

06:01:30 5 But he said that -- that Tory and Megan had
06:01:34 6 been having sex. And that they were in LA, and that
06:01:40 7 Megan was acting funny -- something to that effect --
06:01:43 8 towards Tory and that he didn't understand why but found
06:01:46 9 out that Jonathan, DaBaby, was around, and that he knew
06:01:50 10 that they had been having sex as well; so he assumed
06:01:53 11 that that's why she was treating him the way that she
06:01:56 12 had been. And that Megan eventually invited him over to
06:02:00 13 Kylie's home, and that he thought it was odd, but he
06:02:03 14 went anyway. And -- yeah.

06:02:07 15 Q So all that --

06:02:08 16 A So the thing about -- about DaBaby -- I had
06:02:10 17 not heard that prior to the trial.

06:02:13 18 Q And every bit of this you're saying -- this is
06:02:14 19 what you said -- it's hearsay. You didn't go public
06:02:16 20 with this, because there is no way that you can confirm
06:02:18 21 it with the DaBaby or Jonathan or these people?

06:02:21 22 A Right.

06:02:22 23 Q And, obviously, the dad wasn't there, and he
06:02:24 24 doesn't know what happened.

06:02:25 25 A Right. And then he didn't even get to what

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06:02:27 1 they want to know anyway, which is what happened in the
06:02:29 2 critical moments; so --

06:02:30 3 Q Okay.

06:02:50 4 MR. O'SULLIVAN: All right. For the record,
06:02:50 5 I've marked as Exhibit 66, a one-page document.

06:02:54 6 (Exhibit 66 was marked for identification.)

06:02:54 7 BY MR. O'SULLIVAN:

06:02:55 8 Q And I'll ask you, Ms. Cooper, if you can tell
06:02:57 9 me what this is?

06:02:58 10 A This is a direct message conversation between
06:03:02 11 me and Tory on my current Instagram page via private
06:03:07 12 direct messages.

06:03:09 13 Q Okay. And so the -- all right. So this is
06:03:15 14 him saying what's your number? I have to ask you
06:03:17 15 something.

06:03:17 16 A Yes.

06:03:18 17 Q And you give it to him.

06:03:19 18 A Uh-huh.

06:03:20 19 Q And this is December 13, 2022.

06:03:22 20 A Uh-huh.

06:03:23 21 Q Is that before or after the trial?

06:03:26 22 A It's cutting it real close. I believe trial
06:03:28 23 started within days either prior or -- somewhere real
06:03:31 24 close to it.

06:03:34 25 Q Okay. And so somewhere close to trial.

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06:03:36 1 How long had it been since you had been in
06:03:39 2 touch with him before this "December 13th, got to ask
06:03:42 3 you something"?
06:03:43 4 A It had been a while since talk of that
06:03:46 5 podcast.
06:03:50 6 Q Okay. Talk of possibly doing a podcast with
06:03:53 7 him?
06:03:53 8 A Yeah. He had written me on my previous
06:03:55 9 Instagram.
06:03:56 10 Q Okay. And there was -- and that was back in
06:03:57 11 probably '21?
06:03:59 12 A Maybe.
06:04:00 13 Q And that never came to be?
06:04:01 14 A No.
06:04:02 15 Q Okay. And then it's been a while, and then he
06:04:04 16 reaches out and says I got to ask you something?
06:04:06 17 A Yes.
06:04:07 18 Q Close in time to the trial?
06:04:08 19 A Yes.
06:04:08 20 Q And you gave him the number.
06:04:09 21 And then did you guys talk?
06:04:11 22 A Yes. He did call me.
06:04:12 23 Q And tell me everything you can about that
06:04:15 24 conversation. Everything you said; everything he said.
06:04:18 25 A I believe that this was a really brief

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06:04:21 1 conversation where he wanted me to send an email to his
06:04:26 2 publicist.

06:04:28 3 Q Okay. Who is his publicist?

06:04:34 4 A Her name is Mari.

06:04:36 5 Q Mari the publicist.

06:04:37 6 And what was supposed to be in the email?

06:04:40 7 A The different reasons why I felt like there
06:04:42 8 was some things that were contradictory.

06:04:45 9 Q He wanted you to send an email to his
06:04:53 10 publicist listing reasons that you had questions
06:04:57 11 about --

06:04:58 12 A Yeah.

06:04:58 13 Q -- the case against him?

06:05:00 14 A I think that Mari wanted to know my viewpoint
06:05:04 15 and so -- that she wanted to see why I felt the way I
06:05:07 16 did. I don't know if -- if she was his publicist and
06:05:11 17 trying to feel me out. I don't know.

06:05:13 18 Q Well, okay. Did you actually send the email?

06:05:15 19 A Yes.

06:05:15 20 Q Is that in here somewhere?

06:05:16 21 A I don't know.

06:05:20 22 Q Was it a long email?

06:05:21 23 A It was two. And there were a lot of
06:05:22 24 attachments on one in particular, but it wasn't a long
06:05:25 25 email. It was just me accepting those different items.

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06:05:27 1 Q All right. So the text of the email wasn't
06:05:30 2 long, but there was a bunch of attachments?
06:05:32 3 A Yes.
06:05:33 4 Q If I printed it out, would it be a thick pile?
06:05:37 5 (The Court Reporter requested clarification.)
06:05:37 6 MR. O'SULLIVAN: A thick pile of documents.
06:05:37 7 The attachments.
06:05:40 8 THE WITNESS: No. There were a lot of
06:05:41 9 screenshots.
06:05:41 10 BY MR. O'SULLIVAN:
06:05:42 11 Q So this is -- this is either during or just
06:05:45 12 before the trial; right?
06:05:46 13 A Yeah.
06:05:47 14 Q And what -- what attachments did you choose to
06:05:51 15 forward to the publicist?
06:05:53 16 A I sent her screenshots from Kelsey's mother
06:05:56 17 and sister because they were the reason I initially
06:05:59 18 questioned Megan.
06:06:00 19 Q Oh, right. They reached out to you. Okay.
06:06:03 20 A I sent -- there was a situation where I was
06:06:06 21 set to interview an ex-boyfriend of Megan's who had said
06:06:09 22 some things to me.
06:06:10 23 Q What was that person's name?
06:06:11 24 A His name is Karim, K-A-R-I-M. Karim York
06:06:15 25 Junior.

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06:06:17	1	Q	York?
06:06:18	2	A	Uh-huh.
06:06:18	3	Q	And was it a third name? No?
06:06:20	4	A	No, just Junior.
06:06:21	5	Q	Karim Junior.
06:06:23	6	A	I'm sorry. Yes.
06:06:24	7	Q	Okay. All right. And you were going to
06:06:25	8		interview him. He was a former boyfriend of Megan.
06:06:27	9	A	Yes.
06:06:27	10	Q	And did you actually interview him?
06:06:29	11	A	Not an actual interview.
06:06:30	12	Q	Okay. Did you do a pre-interview, or did you
06:06:32	13		talk to him?
06:06:33	14	A	Yes.
06:06:33	15	Q	Find out what he was going to say?
06:06:35	16	A	Yes.
06:06:35	17	Q	And what was the reason he didn't actually do
06:06:37	18		the interview?
06:06:38	19	A	I believe Megan intercepted.
06:06:40	20	Q	Okay. Did she tell you don't do the
06:06:43	21		interview?
06:06:44	22	A	No. She did not tell me not to do the
06:06:47	23		interview.
06:06:47	24	Q	Did somebody tell you not to do the interview?
06:06:49	25	A	No.

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06:06:49 1 Q Okay. What was in your mind -- like, what
06:06:52 2 caused you to say I would like to interview this guy,
06:06:54 3 and then you talked to him and then you said I'm not
06:06:56 4 going to interview him? What was the intervening event?
06:06:59 5 I know you said generally somebody got to him or
06:07:01 6 something. What did you perceive?

06:07:03 7 A Yeah. So Karim York publicly was moved by
06:07:07 8 something Joe Budden said in regards to women and how
06:07:11 9 men are treated when they're on the receiving end of
06:07:13 10 trying to be accountable, because Megan's mug shot had
06:07:17 11 gone viral.

06:07:17 12 The Internet found out that Megan had been to
06:07:22 13 jail, and they wanted to know why; so she went public
06:07:25 14 and described being physically abusive to her
06:07:28 15 then-boyfriend Karim, and it became a hot topic. Karim
06:07:32 16 then went on Instagram upset and saying basically, y'all
06:07:35 17 are listening to one person tell you a version of
06:07:37 18 events, and it's not true. He accused her of being on
06:07:40 19 drugs and having an alcohol problem. He mentioned a
06:07:43 20 gun. He mentioned broken glass from a car.

06:07:46 21 Q This is in the pre-interview?

06:07:47 22 A This is in a caption on Instagram. He wrote
06:07:49 23 it out.

06:07:50 24 Q To you?

06:07:51 25 A Public.

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06:07:52 1 Q I'm trying to understand why you didn't
06:07:54 2 interview him after you --

06:07:56 3 A Yeah, I was going to. So then he says, "If
06:07:58 4 anyone would like to reach out to me and do an interview
06:08:02 5 reach out," so I did. And we spoke, and he told me some
06:08:05 6 things. And I said, "Let me take a nap."

06:08:07 7 I take my nap and I wake up, Megan has spoken
06:08:10 8 to him on the phone. She has gone live on Instagram.
06:08:13 9 She has recorded a portion of a conversation with him
06:08:16 10 and basically said it wasn't about me, leave me alone,
06:08:20 11 and that was it. And he became uncooperative after
06:08:23 12 that, and that's why the interview didn't take place.

06:08:27 13 Q Okay. So he choose not to tell whatever story
06:08:30 14 he told you before, or he told in his other places --

06:08:33 15 A Right.

06:08:33 16 Q -- after she gave, whatever she gave, her
06:08:35 17 side. He said I'm not going to go there.

06:08:37 18 A Whatever talk they had.

06:08:39 19 Q Okay.

06:08:39 20 MS. HAYRAPETIAN: We don't have those emails.

06:08:46 21 MR. O'SULLIVAN: Well, we'll send a letter to
06:08:48 22 Counsel after that we're missing something.

06:08:48 23 MS. HAYRAPETIAN: Yeah.

06:08:50 24 BY MR. O'SULLIVAN:

06:08:51 25 Q Do you still have that email to the publicist?

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06:08:53 1 A Yes. I was going to produce it on the third
06:08:55 2 set of interrogatories. Yeah. I do have them on my
06:08:58 3 phone.
06:08:58 4 Q Okay. Thank you.
06:08:58 5 MR. O'SULLIVAN: All right. So that's it for
06:09:14 6 this; right? 67.
06:09:35 7 (Exhibit 67 was marked for identification.)
06:09:35 8 BY MR. O'SULLIVAN:
06:09:36 9 Q All right. For the record, I've marked as
06:09:47 10 Exhibit 67 -- I think it's from Ms. Cooper's FTI
06:09:52 11 production Bates number ending in 508. And this is some
06:09:58 12 forensic analysis of what? From her phone?
06:10:00 13 MS. HAYRAPETIAN: Text messages.
06:10:02 14 MR. O'SULLIVAN: Text messages with Daystar.
06:10:04 15 Okay. All right.
06:10:22 16 What's the question? Whether they actually
06:10:24 17 texted that day?
06:10:25 18 MS. HAYRAPETIAN: What they talked about.
06:10:27 19 MR. O'SULLIVAN: Okay.
06:10:28 20 BY MR. O'SULLIVAN:
06:10:28 21 Q Okay. So am I right that -- that, at least
06:10:31 22 according to this, you had some text messages with
06:10:35 23 Daystar -- Tory, on December 22, 2022?
06:10:39 24 A Yes.
06:10:40 25 Q Okay. And -- And we decided that that is

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06:10:46 1 when? During the trial? I just had the date here.

06:10:49 2 MS. HAYRAPETIAN: I have starting

06:10:49 3 December 12th.

06:10:52 4 THE WITNESS: I don't -- around this time, it
06:10:53 5 would have been ending maybe.

06:10:54 6 MS. HAYRAPETIAN: Yeah. It would have been
06:10:55 7 ending around now.

06:10:56 8 BY MR. O'SULLIVAN:

06:10:56 9 Q Okay.

06:10:57 10 A Yeah.

06:10:57 11 Q And let's see. 10:00 PM. 3:24. Okay.

06:11:03 12 Can you -- did you produce in this case the
06:11:08 13 text from that day with Daystar? As far as you know?

06:11:13 14 A I don't recall. I don't know.

06:11:16 15 Q Oh. Did you -- did you guys -- not text.

06:11:20 16 Did you talk on the phone in real time on
06:11:22 17 December 22?

06:11:24 18 A I would imagine I followed up with him if he
06:11:26 19 asked me to call him.

06:11:27 20 Q Okay. And what's -- what's the longest
06:11:31 21 one-on-one conversation you ever had with Tory Lanez?

06:11:35 22 A Not significant at all. The longest was the
06:11:37 23 day I was at his house and everyone was, like,
06:11:39 24 collectively talking.

06:11:40 25 Q And that wasn't even really one-on-one; right?

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06:11:42 1 A Right. No. So I haven't had a substantial
06:11:45 2 conversation with Tory.

06:11:46 3 Q So what's the -- like, how many times have you
06:11:48 4 talked to him on the phone where it's just either the
06:11:51 5 two of you or the two of you and one other person on the
06:11:54 6 phone?

06:11:54 7 A I've been on the phone with him and his father
06:11:56 8 once. Other than that, it's been Instagram. And then
06:12:02 9 he text me here or there, but we never really talked.

06:12:06 10 Q And I'm not sure if this -- this reflects an
06:12:09 11 actual phone call, but he was looking for a phone call.
06:12:12 12 Did -- I don't know what you said before.

06:12:15 13 Did he -- when he asked you to email or to be
06:12:18 14 in touch with his publicist, was that on a phone call?

06:12:21 15 A Yeah.

06:12:21 16 Q Okay. And was anybody other than you and
06:12:26 17 Tory Lanez on that phone call?

06:12:28 18 A No.

06:12:30 19 Q Did he call you, or you called him? He called
06:12:32 20 you?

06:12:32 21 A I followed up with him, I believe.

06:12:33 22 Q All right. You called him --

06:12:35 23 A Or maybe he called me once I gave my number.

06:12:38 24 Q You gave him your number?

06:12:39 25 A Yeah.

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06:12:39 1 Q And he -- so this would be right when the
06:12:42 2 trial ended; right?

06:12:44 3 A Towards it, I believe. I don't know what day
06:12:46 4 exactly.

06:12:46 5 Q But when you talked to him, was he already
06:12:49 6 dealing with a guilty verdict?

06:12:50 7 A I don't believe so.

06:12:51 8 Q It would have come across in his mood,
06:12:53 9 probably.

06:12:54 10 A Right. No. I didn't talk to him after --
06:12:56 11 they remanded -- they took him back after that; so it
06:12:59 12 had to be before.

06:13:00 13 Q Okay. And do you think this is the
06:13:04 14 conversation where he asked you to reach out to the
06:13:06 15 publicist?

06:13:07 16 A No, it was prior to this because -- it was
06:13:10 17 before this, I believe, for sure.

06:13:12 18 Q Can you tell, from the information here, what
06:13:14 19 it was you were talking about on December 22? It looks
06:13:19 20 like three calls, right, separated in time by a few
06:13:22 21 minutes.

06:13:24 22 A Calls or texts?

06:13:25 23 Q I don't know.

06:13:27 24 A These are text?

06:13:28 25 MS. HAYRAPETIAN: These are text messages,

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06:13:28 1 asking for a call.

06:13:30 2 THE WITNESS: Uh-huh. Okay.

06:13:32 3 MR. O'SULLIVAN: Okay. Anything else? Let's

06:13:40 4 take a five-minute break.

06:13:42 5 THE WITNESS: Okay.

06:13:42 6 THE VIDEOGRAPHER: The time is 6:13. We're

06:13:44 7 going off the record.

06:13:48 8 (Recess was taken.)

06:20:05 9 THE VIDEOGRAPHER: The time is 6:20. We're

06:20:12 10 back on the record.

06:20:15 11 MR. O'SULLIVAN: Okay. For the record, I've

06:20:16 12 marked as Exhibit 68 a very small, looks like,

06:20:20 13 QuickBooks entry, and I have one question about this.

06:20:25 14 (Exhibit 68 was marked for identification.)

06:20:25 15 BY MR. O'SULLIVAN:

06:20:25 16 Q If you can piece it together, there's one

06:20:27 17 entry 4/4/2020, or maybe it's 4/4/2023, amount exceeded

06:20:34 18 33,363. And the reference name is sender is

06:20:37 19 Angela Peterson.

06:20:38 20 What's that in reference to?

06:20:41 21 A I have never received a \$33,000 payment from

06:20:46 22 Angela Peterson. I don't know who that is. I don't

06:20:48 23 know what that is.

06:20:49 24 Q Okay. You don't know -- that name doesn't

06:20:51 25 ring a bell to you?

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06:20:52 1 A No.

06:20:52 2 Q Okay. What about this lower, like, "courtesy

06:20:55 3 of Akademiks and the chat" N-word?

06:20:58 4 A So Akademiks and me did live streams together

06:21:03 5 and his fans are called the chat N-words, and so as

06:21:07 6 support they would send cash during that time.

06:21:12 7 Q Okay. So you are saying, like, while you were

06:21:13 8 on the conversation, you say, hey, if you really liked

06:21:16 9 us, send us some money on the chat, on the cash app?

06:21:19 10 A I didn't do that with his people.

06:21:20 11 Q Okay.

06:21:21 12 A But they would donate, yes.

06:21:23 13 Q Got it. And the 33,000 number doesn't -- you

06:21:26 14 don't know what that relates to?

06:21:28 15 A Not at all. And I've never received \$33,000.

06:21:31 16 Q Okay.

06:21:39 17 MR. O'SULLIVAN: 69. No. That's the same

06:21:41 18 one.

06:21:56 19 MS. HAYRAPETIAN: The top one was yours.

06:21:57 20 Can we actually switch that one out.

06:22:01 21 MR. O'SULLIVAN: Okay. Pass that one back to

06:22:03 22 me, if you don't mind.

06:22:03 23 THE WITNESS: Okay.

06:22:03 24 MR. O'SULLIVAN: Oh. I see it has the arrow.

06:22:07 25 MS. HAYRAPETIAN: Uh-huh.

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06:22:10 1 MR. O'SULLIVAN: Would you mark that one
06:22:11 2 again. Sorry about that.

06:22:28 3 (Exhibit 69 was marked for identification.)

06:22:28 4 BY MR. O'SULLIVAN:

06:22:29 5 Q For the record, I marked as 69 another one of
06:22:31 6 these little, looks like a QuickBooks sheet. It has
06:22:34 7 some account activity or cash app activity. And the one
06:22:37 8 I have a question about, same thing, has this amount
06:22:40 9 exceeded -- 77,000-something, Shanika Lawry.

06:22:45 10 Does that ring a bell?

06:22:47 11 A Not at all. I wish I got \$77,000 from
06:22:49 12 somebody.

06:22:50 13 Q All right.

06:22:55 14 A And I'm not even -- I'm pretty certain you
06:22:57 15 can't send -- just this 30,000; 77,000 -- you can't even
06:23:00 16 send that over cash app.

06:23:01 17 Q Okay. How about the one at the bottom --
06:23:07 18 "3,020, subject: Your hard work, Baisden."

06:23:12 19 Do you know what that is?

06:23:14 20 A Actually, no. And I don't think it came
06:23:16 21 through either. I don't recall that either.

06:23:20 22 Q Is that -- does the name ring a bell --
06:23:22 23 Baisden?

06:23:23 24 A No. I don't know who that is.

06:23:26 25 Q Anybody write you \$3,000 for your hard work?

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06:23:30 1 A No. I would have remembered that.

06:23:31 2 Q Okay. Have -- have -- have you received --

06:23:48 3 I'm asking this very broadly. Have you received money

06:23:51 4 from anybody in the world to help you support Tory in

06:23:55 5 any way in connection with his situation --

06:23:57 6 A No.

06:23:57 7 Q -- that you haven't talked about today?

06:24:00 8 A No.

06:24:01 9 Q Okay. And we talked about the payments from

06:24:02 10 his dad. You've -- you've told us about that.

06:24:05 11 Nobody else has given you money to help you do

06:24:09 12 anything to support Tory?

06:24:11 13 A No.

06:24:11 14 Q Okay. And -- okay.

06:24:19 15 MS. HAYRAPETIAN: Can you please pull up

06:24:20 16 Tab 36 A-1, audio.

06:24:28 17 STENO TECH ASSISTANT: Just a one moment,

06:24:28 18 please.

06:24:29 19 MR. O'SULLIVAN: This will be 70 --

06:24:30 20 MS. HAYRAPETIAN: 70-B.

06:24:55 21 MR. O'SULLIVAN: Okay. We're good to play it.

06:24:56 22 (A video clip was played.)

06:24:58 23 (Exhibit 70-A was marked for identification.)

06:24:58 24 (Exhibit 70-B was marked for identification.)

06:25:13 25 BY MR. O'SULLIVAN:

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06:25:13 1 Q Was that a truthful statement? That Megan is
06:25:15 2 mentally retarded? Yes or no?

06:25:18 3 MS. DIXON: Objection as to form.

06:25:21 4 THE WITNESS: I can't --

5 (The Court Reporter requested clarification.)

06:25:18 6 MS. DIXON: Objection as to form.

06:25:19 7 (Multiple Simultaneous Speakers.)

06:25:19 8 THE WITNESS: I --

06:25:19 9 (The Court Reporter requested clarification.)

06:25:27 10 BY MR. O'SULLIVAN:

06:25:27 11 Q She's asking you to answer the question: Is
06:25:27 12 that a truthful statement that Megan is mentally
06:25:30 13 retarded?

06:25:30 14 A I can't say.

06:25:31 15 Q Okay. When you said here, "I think she's
06:25:34 16 actually mentally retarded," you meant -- did you mean
06:25:37 17 to say I can't say whether she is?

06:25:40 18 A Right. So I said, "I think."

06:25:42 19 Q Okay. And have you reviewed any of Megan's
06:25:46 20 medical records?

06:25:47 21 A No.

06:25:47 22 Q Do you have access to any diagnostics that
06:25:49 23 would support the idea that she has a disorder out
06:25:51 24 something?

06:25:52 25 A No.

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06:25:53 1 Q Okay.

06:26:02 2 MR. O'SULLIVAN: I've used up all my time.

06:26:04 3 Thank you for your time.

06:26:05 4 THE WITNESS: Thank you.

06:26:07 5 MS. DIXON: Thank you.

06:26:07 6 THE VIDEOGRAPHER: Before we go off the

06:26:07 7 record --

06:26:11 8 THE COURT REPORTER: Do you want a copy of the

06:26:12 9 transcript?

06:26:14 10 MS. DIXON: Yes.

06:26:17 11 THE VIDEOGRAPHER: Would you like your video

06:26:18 12 sync'd with the transcript?

06:26:19 13 MR. O'SULLIVAN: Yes, please.

06:26:22 14 THE VIDEOGRAPHER: Would you like a copy,

06:26:23 15 Counsel? We can follow up --

06:26:24 16 MS. DIXON: Of the video?

06:26:26 17 THE VIDEOGRAPHER: Yes.

06:26:27 18 MS. DIXON: You mean, it's a separate thing?

06:26:28 19 I thought --

06:26:30 20 THE VIDEOGRAPHER: This concludes the

06:26:31 21 deposition of Milagro Elizabeth Cooper. The time is

06:26:35 22 6:26. We're going off the record.

23 (Proceedings concluded at 6:26 PM.)

24 - - -

25

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DECLARATION UNDER PENALTY OF PERJURY

I, the undersigned, declare under penalty of perjury that I have read the entire foregoing transcript of my deposition or the same has been read to me, and the same is true and accurate, save and except for changes, corrections, additions or deletions indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the _____ day of _____, 20____,
at _____, _____.
(City) (State)

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I, RONNY ZAVOSKY, CSR No. 12359, certify that the foregoing proceedings were taken before me at the time and place therein set forth, at which time the witness was duly sworn and that the transcript is the true record of the testimony so given;

Witness review, correction and signature;

(X) shall be per venue code () was requested

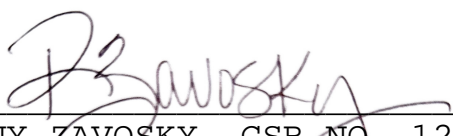
() was not requested () was waived

() not handled by the deposition officer due to party stipulation

The dismantling, unsealing, or unbinding of the original transcript will render the reporter's certificate null and void.

I further certify that I am not financially interested in the action, and I am not a relative or employee of any attorney of the parties, nor of any of the parties.

Dated this 28th day of July, 2025.



RONNY ZAVOSKY, CSR NO. 12359
CERTIFIED SHORTHAND REPORTER

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25 Milagro Elizabeth Cooper

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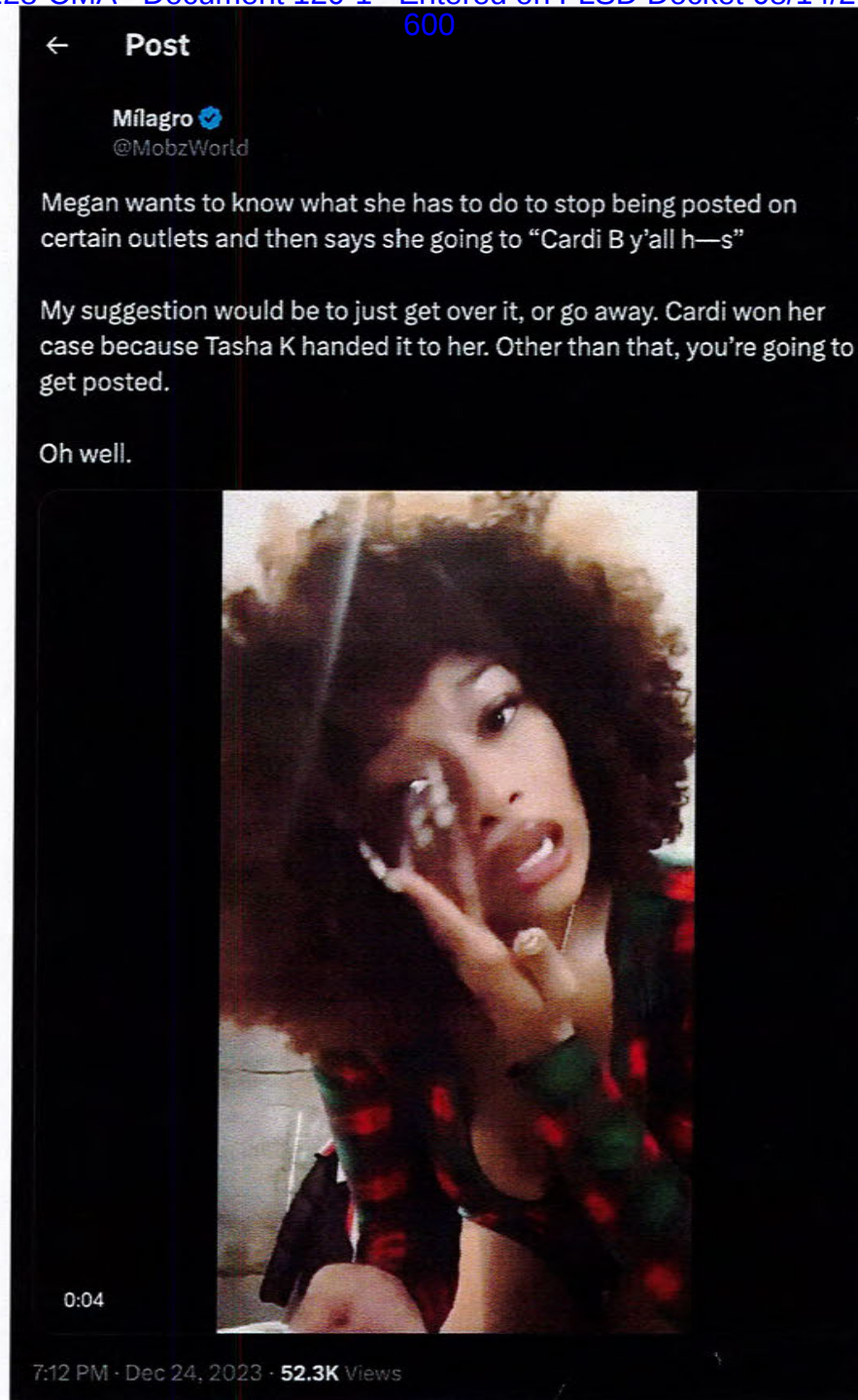
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Audio Transcript

Case Number: 1:24-cv-24228

Date:

In the matter of:

MEGAN PETE v MILAGRO ELIZABETH COOPER



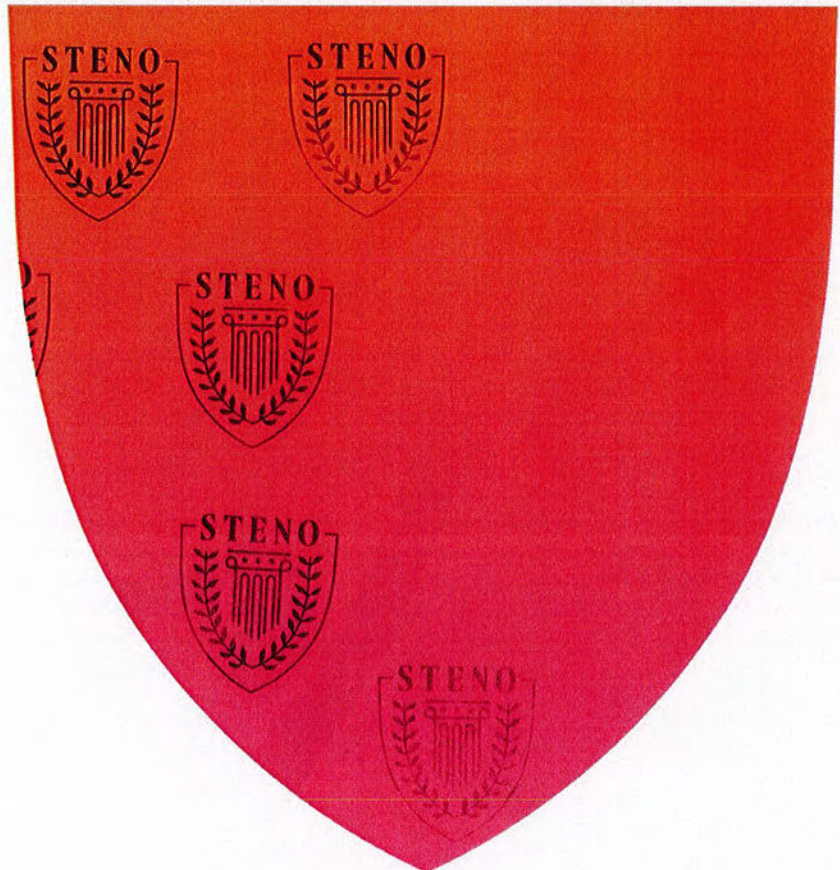
Pete_0000927.mp4

**CERTIFIED
COPY**

Reported by:
Trent Kolka

Steno
Official Reporters

1100 Glendon Avenue
Suite 1850
Los Angeles, CA 90024
concierge@steno.com
310.573.8380



United States District Court
Southern District of Florida

Action No. 1:24-cv-24228

In the Matter of:)
Megan Pete v. Milagro Elizabeth Cooper)
_____)

TRANSCRIPTION OF AUDIOTAPE

Clip from Pete_0000927.mp4

Recorded audiotaped clip of Milagro Elizabeth Cooper,
the Defendant.

Transcribed by
Trent Kolka

AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Pete_0000927.mp4

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Appearances

Milagro Elizabeth Cooper

AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Pete_0000927.mp4

1 MS. COOPER: At the end of the day, a bitch
2 lying on somebody is low down. So believe what the fuck
3 you want to believe. But unless somebody kept it a
4 buck, I ain't got no sympathy for that bullshit. Y'all
5 can keep up with that. Yes, she got hurt. Yeah, and
6 that's cool. But how did you get hurt? How? And what
7 are the circumstances? And what after that? So, bitch,
8 if you think I'm going to be sitting up here boohooing
9 for a bitch that played up in y'all face, not mine.
10 Because I always said her ass was lying. Bitch, I
11 don't. You think I feel sorry for the bitch? I don't.
12 The fuck? A bitch fuck with my nigga, I'm going to slap
13 that hoe and whatever come after it, come after it. The
14 fuck.

AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Pete_0000927.mp4

CERTIFICATE

I Trent Kolka certify that I was authorized to and did transcribe the above audio and that the transcript is a true and correct record of the audio provided. I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Trent Kolka T.K

Trent Kolka

Transcriber

2nd June, 2025

AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Pete_0000927.mp4

A	M
ass 3:10	mine 3:9
B	N
bitch 3:1,7,9,10,11,12	nigga 3:12
boohooing 3:8	
buck 3:4	P
bullshit 3:4	played 3:9
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hurt 3:5,6	
L	
low 3:2	
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA



MEGAN PETE, an individual

Plaintiff,

Civil Action No. 1:24-cv-24228-CMA

v.

MILAGRO ELIZABETH COOPER,
an individual,

**SECOND AMENDED COMPLAINT
JURY TRIAL DEMANDED**

Defendant.

Pursuant to the Court's February 7, 2025 Order, Plaintiff Megan Pete hereby files the Second Amended Complaint (hereinafter, the "Second Amended Complaint" or "SAC") against Milagro Elizabeth Cooper ("Defendant"). Ms. Pete alleges the following facts, upon her own knowledge and upon information and belief:

NATURE OF THE ACTION

1. Defendant is the longtime mouthpiece of Daystar Peterson (aka "Tory Lanez"), a convicted felon who shot Ms. Pete in 2020 and has been working with him ever since to falsely brand Ms. Pete an incompetent liar and alcoholic. As part of their vendetta, Defendant spreads vicious and hateful rumors about Ms. Pete to Defendant's over 100,000 social media followers, causing Ms. Pete extreme emotional distress. Defendant's malicious intent is clear: discredit and shame Ms. Pete because of her testimony at Mr. Peterson's trial, which ultimately landed him in prison where he is currently serving a ten year sentence for shooting Ms. Pete. Even from behind bars, prison calls show Mr. Peterson is still orchestrating this campaign with Defendant as his mouthpiece.

2. Since Mr. Peterson's 2020 indictment for felony assault with a firearm after shooting Ms. Pete, to his later conviction in December 2022 (the "Trial"), up through today, Defendant has performed Mr. Peterson's bidding by spreading malicious falsehoods about Ms. Pete. Defendant does so by engaging in disgusting acts of harassment directed at Ms. Pete on Defendant's online social media platforms. The only purpose of her statements are to bully, harass and punish Ms. Pete for Mr. Peterson's conviction, to tarnish her reputation, and to cause her severe emotional distress.

3. The lengths to which Defendant has gone to harass and maliciously injure Ms. Pete knows no bounds. For example, she has promoted a deepfake pornographic video artificially depicting Ms. Pete purportedly engaging in sexual acts without her knowledge or consent. After Defendant's promotion of this video led to a firestorm of negative reaction from others, Defendant doubled-down in a YouTube video on June 9, 2024, claiming Ms. Pete was a "professional victim" and denying any wrongdoing. But Defendant is wrong—her conduct was an unlawful promotion of an altered sexual depiction that caused, and was intended to cause, Ms. Pete severe emotional distress and reputational harm.

4. Defendant has also defamed Ms. Pete and sought to destroy her reputation by spreading falsehoods repeatedly asserting that Ms. Pete is a liar who perjured herself in the Trial, falsely accused Mr. Peterson of a felony, and is continuing to lie to the courts. Incredibly, Defendant has continued to spread such defamatory falsehoods even after Mr. Peterson was found unanimously guilty by a jury, beyond a reasonable doubt, for the exact crimes Ms. Pete testified that he committed. Defendant attended the Trial and is well aware of Mr. Peterson's guilty verdict—which is nearly two years old—but continues to spread a false narrative without any factual basis that Ms. Pete lied.

5. Defendant has even publicly admitted to spreading misinformation about the Trial. She first promoted the frivolous conspiracy theory that Ms. Pete was never injured by a gunshot wound, but simply stepped on broken glass. She then claimed that if Ms. Pete was indeed shot, it was not Mr. Peterson who shot her, and later falsely claimed that Mr. Peterson is an innocent man stuck behind bars because the firearm from the shooting is missing and cannot be tested, a complete lie. After perpetuating this misinformation campaign, Defendant *finally*, on November 19, 2024, admitted her claims were bogus.

6. Defendant's false statements regarding the Trial are part and parcel of a conspiratorial relationship with Mr. Peterson in which Defendant acts as a paid surrogate used to spread Mr. Peterson's lies about Ms. Pete. Indeed, on October 29, 2024, Defendant implied that she was "still on [Mr. Peterson's] payroll." Further, as Mr. Peterson's prison call logs obtained through early discovery in this case demonstrate, Mr. Peterson has repeatedly discussed Defendant with his father—the two confidently asserted that Ms. Pete would never be able to prove that Mr. Peterson pays or paid Defendant for attacking Ms. Pete. By consciously coordinating with Ms. Pete's convicted assaulter simply to amplify Mr. Peterson's disproven and baseless theories to help him seek retribution against Ms. Pete—the true victim of Mr. Peterson's criminal acts—Defendant engaged in extreme and outrageous conduct that has caused, and continues to cause, Ms. Pete severe emotional distress.

7. Defendant's defamatory statements are not limited to accusing her of perjury at the Trial. Indeed, Defendant has repeatedly attacked Ms. Pete with false accusations that she is mentally retarded, requires a guardian and suffers from alcoholism. Defendant has no personal relationship with Ms. Pete and no basis in fact to make such accusations. It is without question that

Ms. Pete—a world renowned hip-hop artist and Grammy winner—is not mentally retarded, does not have a guardian, and is not an alcoholic.

8. Ms. Pete has repeatedly taken to social media to address the toll that accusations of her lying about Mr. Peterson and the Trial have had on her mental health and wellbeing. At one point during the Trial, Ms. Pete testified to having suicidal thoughts. In response to Ms. Pete’s vulnerability and pleas for peace, Defendant suggested that Ms. Pete should “just get over it, or go away.”

9. Enough is enough. Ms. Pete—a victim of a violent crime and champion of women’s rights to her millions of fans worldwide—will no longer stand for Defendant’s campaign of harassment. She brings this First Amended Complaint for damages and equitable relief to end Defendant’s vendetta against her.

II. THE PARTIES

A. The Plaintiff

10. Megan Pete, a performance artist also known as Megan Thee Stallion, is a citizen of Florida who permanently resides in Miami, Florida.

11. Since 2021, Ms. Pete’s primary and permanent residence is and has been in Florida. She pays state taxes in Florida. Florida is the principal place of business for her business entities—Hot Girl Touring, LLC and Megan Thee Stallion, Entertainment, Inc. Her personal possessions—such as cars, clothing, awards, and her pet dogs—stay and remain in Florida when she travels for business. She spends her holidays in Florida. This year, Ms. Pete obtained a Florida driver’s license and is registered to vote in Florida. In sum, Ms. Pete intends to stay and remain in Florida.

B. The Defendant

12. Milagro Elizabeth Cooper, also known as Milagro Gramz or Mobz World, is a citizen of Texas who permanently resides in Houston, Texas. Defendant Cooper’s Mobz World

website lists a Houston, Texas address as its permanent address. She has over 100,000 followers, some of whom are Florida residents and therefore received her salacious and defamatory statements about Ms. Pete.

III. JURISDICTION AND VENUE

13. This Court has subject-matter jurisdiction over the state law claims alleged herein under 28 U.S.C. § 1332 (Diversity Jurisdiction) and 28 U.S.C. § 1367 (Supplemental Jurisdiction), because there is complete diversity between the parties, the amount in controversy exceeds the sum of \$75,000 exclusive of interest, costs and fees, and all the claims are so related that they form part of the same case or controversy under Article III of the United States Constitution.

14. The Court has personal jurisdiction over Defendant. Defendant published defamatory material on the Internet, intentionally making her defamatory statements instantly available to anyone with an Internet connection. By publishing defamatory statements about Ms. Pete, a Florida citizen, Defendant directed her false statements regarding a Florida citizen to readers worldwide—including those in Florida. Upon information and belief, numerous third-parties in Florida accessed Defendant's defamatory statements in Florida. Accordingly, Defendant committed tortious acts within this state. § 48.193(1)(a)(2), Fla. Statutes; *Internet Solutions Corp. v. Marshall*, 39 So. 3d 1201, 1214-1216 (Fla. 2010) (holding a nonresident defendant commits a tortious act in Florida by virtue of posting defamatory statements about a Florida resident on a website accessed in Florida). Defendant has minimum contacts with Florida such that the exercise of personal jurisdiction over her comports with the traditional notions of fair play and substantial justice and is consistent with the Due Process Clause of the United States Constitution. Defendant's intentional tort of defamation was purposefully directed at Ms. Pete, a Florida resident, and the brunt of harm was felt by Ms. Pete in Florida. Ms. Pete's claims directly arise

from and relate to the false and defamatory statements Defendant made. *See Keeton v. Hustler Magazine, Inc.*, 465 U.S. 770, 773-74, 781 (1984); *Calder v. Jones*, 465 U.S. 783, 788-89 (1984); *Internet Solutions Corp.*, 39 So. 3d at 1214-1216.

15. Venue is proper in the Miami Division of the United States District Court for the Southern District of Florida because Defendant published defamatory statements to a wide audience that include persons who reside within the Miami Division. Defendant caused substantial harm to Ms. Pete's personal and professional reputations in Florida. Additionally, a substantial part of the events giving rise to the claims stated in this action occurred in the Southern District of Florida.

IV. FACTUAL ALLEGATIONS

A. The Criminal Trial And Conviction Of Mr. Peterson.

16. To understand the context surrounding Defendant's defamatory statements, it is imperative to understand the history of Mr. Peterson's criminal conduct against Ms. Pete, his Trial, and his conviction on three felony charges which resulted in Mr. Peterson's ten-year prison sentence.

17. On July 12, 2020, the Los Angeles Police Department conducted a traffic stop on Mr. Peterson's car after it received reports of shots fired in the Hollywood area and Mr. Peterson's car matched the suspect's description. During the traffic stop, police discovered a firearm, warm to the touch and with its magazine fully emptied, underneath the floorboard where Mr. Peterson was seated, and arrested him on charges of carrying a concealed weapon.

18. On that night, Ms. Pete was present in the car with Mr. Peterson and his driver, along with Kelsey Harris, Ms. Pete's former best friend and assistant. Through the course of the traffic stop, it was discovered that Ms. Pete had injuries to her foot. She was taken to a hospital for treatment.

19. On July 15, 2020, Ms. Pete announced via social media that the injuries she suffered on the night of Mr. Peterson's arrest were gunshot wounds. Later, on August 20, 2020, Ms. Pete publicly identified Mr. Peterson as the person responsible for shooting her.

20. On October 8, 2020, the Los Angeles County district attorney's office charged Mr. Peterson with felony assault with a semiautomatic firearm for the injuries he caused Ms. Pete on July 12, 2020. The district attorney's office later added charges for illegal possession of a firearm and negligent discharge of a firearm.

21. On December 12, 2022, Mr. Peterson's Trial began. The following day, Ms. Pete took the stand as a witness for the prosecution and the victim of Mr. Peterson's crimes. Ms. Pete testified that on the night of the shooting, she exited Mr. Peterson's car and was walking away with her back facing Mr. Peterson, when Mr. Peterson pointed the gun at her, said "Dance, bitch" and fired five shots at her, causing gunshot wounds to her feet. She also testified to the trauma she has faced since the shooting.

22. Ms. Pete stated: "Because I was shot, I've been turned into some kind of villain, and he's the victim. This has messed up my whole life ... This whole situation in the industry is like a big boy's club ... I'm telling on one of y'all friends, now you're all about to hate me." Ms. Pete also testified to the online backlash she received from individuals who claimed that she lied about the fact that Mr. Peterson shot her, or that she was even shot at all. Ms. Pete stated: "I can't even be happy. I can't hold conversations with people for a long time. I don't feel like I want to be on this earth. I wish he would have just shot and killed me, if I knew I would have to go through this torture." She also testified to suffering from suicidal thoughts since the shooting.

23. Defendant was present in the courtroom for the entirety of the Trial, including Ms. Pete's testimony.

24. On December 23, 2022, after a two-day deliberation, the jury returned a unanimous guilty verdict, finding Mr. Peterson guilty beyond reasonable doubt of all three felony charges brought against him for the shooting of Ms. Pete.

25. On December 12, 2023, Mr. Peterson filed a writ of habeas corpus challenging his conviction. On February 26, 2024, Mr. Peterson filed an opening brief to appeal his conviction. And on October 23, 2024, Mr. Peterson filed another writ of habeas corpus challenging his conviction. The attorney general of California has opposed Mr. Peterson's appeal and writs.

B. Defendant Is A Malicious Actor That Operates Social Media Accounts That Spread False And Harassing Content.

26. Defendant is an online social media personality.

27. Defendant controls and operates X (formerly Twitter) accounts under the usernames @MobzWorld, @NiggaGirl_, and @MilagroGramz__; Instagram and TikTok accounts under the username @milagrogramz; a YouTube account under the username @MobRadio; and a Stationhead account under the username @MILAGROGRAMZ (collectively, the "Social Media Accounts"). Defendant has the power to determine the subject matter and specific content that is published on her Social Media Accounts, and to remove or refrain from publishing content if she chooses. Defendant is the sole speaker, writer and/or editor of every post on her Social Media Accounts. Collectively across her Social Media Accounts, Defendant has over 100,000 followers.

28. Defendant has publicly admitted that she is not a journalist. Rather, it is apparent that she is—try as she might to conceal it from her followers—a hired gun for Mr. Peterson.

C. Defendant Cooper Conspired With Mr. Peterson And Others To Intentionally Spread Misinformation About Ms. Pete And Cause Severe Emotional Distress.

29. Defendant has conspired with Mr. Peterson and his father to execute a widespread campaign to maliciously injure Ms. Pete's reputation and inflict severe emotional distress upon

her in retaliation for her testimony regarding Mr. Peterson's unlawful act of gun violence against her.

30. It is no secret that Defendant has a close relationship with Mr. Peterson. Not only has she repeatedly demonstrated her support for Mr. Peterson on her Social Media Accounts, she has publicly acknowledged her friendship with Mr. Peterson's father, Sonstar Peterson. In a February 27, 2022 Instagram post that has since been deleted, Defendant shared a video of herself out with Sonstar Peterson. A true and correct copy of a screenshot of that post is attached below.



31. While Defendant's social media posts celebrating the Petersons portray merely an innocent and supportive relationship, Defendant also has a financial incentive to act as a paid surrogate to spread defamatory statements about Ms. Pete while Mr. Peterson serves a ten-year prison sentence.

32. In an October 29, 2024 livestream posted to her Social Media Accounts, Defendant implied that she is "still on [Mr. Peterson's] payroll." This is consistent with statements made by Defendant's former best friend, King Noir, who exposed Defendant for working alongside Mr.

Peterson to smear Ms. Pete's reputation. King Noir stated that Defendant "talks to Tory's daddy" in an effort to leak information to the press that comes from Mr. Peterson himself.¹

33. Moreover, as Mr. Peterson's prison call logs demonstrate, Mr. Peterson has repeatedly discussed Defendant with his father. In one phone call, the Petersons confidently asserted that Ms. Pete would be unable to prove that Mr. Peterson paid Defendant for attacking Ms. Pete.

34. On information and belief, Defendant has also coordinated with Mr. Peterson's criminal defense attorneys, the same attorneys who have now agreed to represent her in this civil lawsuit, to spread misinformation related to Mr. Peterson's trial, conviction and appeal. As an early example of Defendant's relationship with Mr. Peterson's (prior) criminal defense attorneys, Defendant released confidential information to the public ahead of its disclosure in court in an attempt to manufacture a false narrative about Mr. Peterson and rally the public against Ms. Pete. For instance, in a February 23, 2022 livestream posted to her X account, Defendant admitted that she and blogger Livingston Allen "got the same sources" that Mr. Peterson's DNA was not present on the firearm. This "source" could only have been Mr. Peterson's then-criminal defense attorneys, to whom the DNA report was turned over. In truth, at the pre-Trial hearing on February 23, 2022—held after Defendant and Mr. Allen shared the misinformation regarding Mr. Peterson's DNA—no one stated that Mr. Peterson's DNA was not found on the firearm.² In reality, the DNA results from the firearm were "inconclusive," meaning that Mr. Peterson could not be excluded or included as one of the possible contributors of the mixed genetic material.

¹ <https://thesource.com/2022/07/27/former-friend-of-milagro-gramz-blasts-her-for-allegedly-working-with-tory-lanez-in-smear-efforts-against-megan-thee-stallion/>

² <https://www.politifact.com/factchecks/2022/feb/28/facebook-posts/hearing-did-not-include-dna-evidence-vindicate-rape/>

35. On information and belief, Defendant also coordinated with the Petersons to employ online “bot” accounts to attack Ms. Pete and her supporters with hateful, derogatory, and malicious statements on social media.

36. Further, Defendant has used her social media platform to incite violence against Ms. Pete. On December 21, 2022, Defendant posted a livestream video to her Instagram account wherein she stated: “A bitch fuck with my n***a I’m a slap that hoe and whatever comes after it comes after it.” Defendant’s statement is reasonably understood to refer to Ms. Pete and her involvement in Mr. Peterson’s trial.

37. Defendant knew and/or should have known that Ms. Pete was susceptible to severe emotional distress regarding the false and disproven theories Defendant shared on behalf of Mr. Peterson. Defendant was present for the Trial and Ms. Pete’s testimony. During her testimony, Ms. Pete lamented that she has “been turned into some kind of villain” and “wish[es] he would have just shot and killed me, if I knew I would have to go through this torture.” She also testified to suffering from suicidal thoughts since the shooting.

38. By consciously coordinating with Ms. Pete’s convicted assaulter to amplify Mr. Peterson’s disproven and baseless theories to help him seek retribution against Ms. Pete, Defendant engaged in extreme and outrageous conduct that has caused, and continues to cause, Ms. Pete severe emotional distress.

D. Defendant Engaged In A Years-Long Campaign of Harassment Against Ms. Pete.

39. Throughout Mr. Peterson’s Trial and continuing through today, Defendant has engaged in a campaign of harassment on behalf of Mr. Peterson to spread false and harassing messages about Ms. Pete on her Social Media Accounts.

Defendant Promoted The Deepfake Video.

40. Commencing no later than June 8, 2024, Defendant began promoting a deepfake video purporting to show an artificially created version of Ms. Pete engaging in sexually explicit acts (the “Deepfake Video”) to her over 100,000 Social Media Accounts followers.

41. It is unknown who created the Deepfake Video. Ms. Pete had no knowledge of or involvement in the creation or distribution of the Deepfake Video, nor did she consent to or authorize the creation or distribution of the Deepfake Video.

42. In June 2023, Defendant registered for an X account using the screenname @MobzWorld. In registering for an X account, Defendant created a profile on X, including, among other things, a “Likes” page on her X profile. “Likes” are a feature of X whereby a user can show their support for a post by clicking the “like” button, which is portrayed as a heart symbol under each individual X post. “Likes” are then recorded for each post and publicized as a statistic that is visible on each post, with more popular posts featuring a higher number of “likes,” and less popular post showing few to no “likes.” As with any X user, Defendant’s “Likes” page on her X profile tracked and displayed the posts that Defendant “liked,” *i.e.* posts which Defendant pressed the “like” icon from her X account. Defendant’s “Likes” page was featured as a tab on Defendant’s X profile and accessible to all third-party X users.³

43. On or about June 8, 2024, Defendant “liked” an X post that included the Deepfake Video. By “liking” this X post, the post was archived to and displayed on Defendant’s “Likes” page, and the video in that post could be viewed from her “Likes” page by visitors.

³ X has since made “Likes” inaccessible to the public such that only the owner of a profile can see his/her own likes. At the time of Defendant’s posts, however, “Likes” were accessible for all of her followers to see, a fact Defendant knew.

44. Defendant knew or reasonably should have known that the Deepfake Video was an altered sexual depiction. Indeed, on that same day, Defendant posted on her X account: “With the way deep fake and AI be going these days....If it’s not her she should sue whoever made it. That sht [sic] dry af [sic] to do to people.” The “her” Defendant referred to is reasonably understood to mean Ms. Pete.

45. Nonetheless, on or about the same day, Defendant further promoted the Deepfake Video by posting the following statement on her X account: “Go to my likes[.]” Of course, Defendant intended for this statement to encourage her followers and other members of the public to watch the Deepfake Video, which had been added to her “Likes” page around the same time. When a user went to Defendant’s “Likes” page, they could access the archived post “liked” by the Defendant that displayed the Deepfake Video, which could then be played by anyone visiting her “Likes” page. A true and correct copy of a screenshot of the X post is below.⁴



⁴ As the screenshot below notes, Defendant has since deleted the “[g]o to my likes” X post from her X profile.

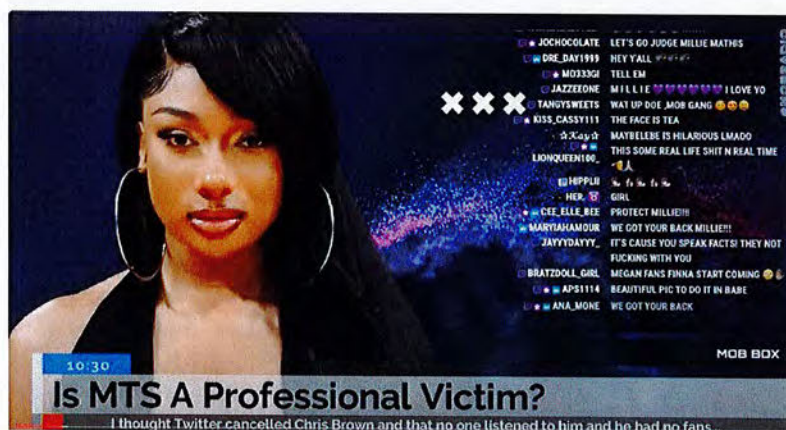
46. Numerous subscribers, followers, viewers, and other third-party individuals followed the Defendant's advice and accessed the Deepfake Video via her X "Likes" page. As one media outlet reported, the Deepfake Video "*gained popularity*" after Defendant "liked" the Deepfake Video post and encouraged her followers to view it.⁵ (emphasis added).

47. On June 8, 2024, the Defendant published a livestream video on her Stationhead account where she discussed her "[g]o to my likes" X post that promoted the Deepfake Video.

48. In the Stationhead post, the Defendant stated: "If y'all want to be mad at something, this is what I'll give you: *be mad that I drew attention to it*," referring to her conduct in promoting and directing her followers to the Deepfake Video. (emphasis added).

49. The next day, on June 9, 2024, the Defendant published a video on her YouTube account to her more than 74,000 subscribers that addressed her "[g]o to my likes" X post related to the Deepfake Video.⁶

50. In the YouTube post, Defendant shared an image of Ms. Pete over a news chyron that questioned whether Ms. Pete is "[a] professional victim." A true and correct copy of the screenshot of the image is below.



⁵ <https://uproxx.com/music/megan-thee-stallion-ai-sex-tape-response/>

⁶ <https://youtu.be/FUUzzmSNWIQ?si=aGv89UImII2BcMIE>

51. Defendant then shared a screenshot of the June 8, 2024 X post that directed her followers to “[g]o to my likes” referenced in Paragraph 44, *supra*.

52. In her June 9, 2024 YouTube post, the Defendant affirmed that she had previously promoted the Deepfake Video by stating that she “told whoever follows me on social media to go to my likes to see what it is that we’re discussing[.]”

53. By “liking” the Deepfake Video such that it then became archived and displayed on, and viewable from, the “Likes” page of her X profile, and then by directing and encouraging her over 100,000 social media followers across her various Social Media Accounts to her X “Likes” page to watch the Deepfake Video, the Defendant promoted, transmitted, published, distributed, circulated, disseminated, presented, exhibited, posted, and shared an altered sexual depiction of Ms. Pete online that was done without Ms. Pete’s consent.

**Defendant Engaged In Campaign Of Spreading
Malicious Falsehoods Regarding Ms. Pete.**

54. The Defendant has wielded her influence on her Social Media Accounts to engage in a sustained campaign of repeatedly defaming Ms. Pete with malicious, knowing, and injurious falsehoods accusing her of everything from (a) lying under oath in Mr. Peterson’s trial and falsely accusing him of a felony, (b) being an alcoholic, and (c) being someone who is mentally incapacitated and in need of a guardian.

***a.* Defendant Spread The Falsehood That Ms. Pete Lied Under
Oath And Falsely Accused Mr. Peterson Of A Felony.**

55. The Defendant has not only spread misinformation regarding Mr. Peterson’s trial, she has also used her Social Media Accounts to falsely brand Ms. Pete as a liar. The result of Defendant’s conduct has caused Ms. Pete severe emotional distress and mental anguish—at one

point during the Trial, Ms. Pete contemplated suicidal thoughts. More recently, Ms. Pete stated publicly that she “would rather not live through this than to have to live with this.”⁷

56. The Defendant has made repeated false statements that Ms. Pete lied during her testimony against Mr. Peterson in the trial and perjured herself. For example, on December 21, 2022—a mere week after Ms. Pete testified at the Trial and the day before jury deliberations began—Defendant posted a livestream video to her Instagram account wherein she stated: “At the end of the day, *a bitch lying* on somebody is low down [...] Yes she got hurt. And that’s cool. But how did you get hurt? How? And what are the circumstances? And what after that? So bitch, if you think I’m finna be sitting up here boo hooing for a bitch that played up in yall face. Not mine, because *I always said her ass was lying*. Bitch, I don’t. You think I feel sorry for the bitch? I don’t. The fuck? A bitch fuck with my n***a I’m a slap that hoe and whatever comes after it comes after it.” (emphasis added). Defendant’s statements are reasonably understood to refer to Ms. Pete because they refer to the woman who “got hurt”—*i.e.*, Ms. Pete—and assert that this individual lied under oath during her testimony at trial and falsely accused another person of a felony. Defendant’s statement further incited physical violence against Ms. Pete by stating, “I’m a slap that hoe and whatever comes after it comes after it.”

57. Additionally, on or around December 21, 2022, Defendant posted a statement to her X account that accused Ms. Pete of being a “non credible witness” who falsely accused Mr. Peterson of a felony. A true and correct copy of a screenshot of the X post is attached below.

⁷ Ms. Pete discussed the psychological and emotional harm she underwent as a result of Defendant’s conduct regarding the trial in her recent documentary, *Megan Thee Stallion: In Her Own Words*: <https://www.primevideo.com/region/eu/detail/Megan-Thee-Stallion-In-Her-Words/00KIOBAGN7RJ89Z589INBE881H>



Milagro Gramz ✓
@MilagroGramz__

All this case taught anyone was that
your father, brother, cousin, or son
could face over 20 years in prison
without proper evidence, a botched
investigation, & another likely suspect
just because non credible witnesses
said you did something.
& y'all slow as 🤡s cheering

The above statement is reasonably understood to refer to Ms. Pete as a “non credible witness[],” and to assert that she falsely accused Mr. Peterson of a felony and gave false testimony under oath.

58. On December 23, 2022, Mr. Peterson was found guilty by a jury of his peers of shooting Ms. Pete. Incredibly, despite Defendant being fully aware that Mr. Peterson had been found guilty, she nonetheless knowingly persisted in pressing the false narrative that Ms. Pete lied in claiming Mr. Peterson shot her.

59. On June 22, 2023, X user account @holidayholidayK shared audio of Defendant wherein she stated: “I believe that this is exactly how they feel about you, Megan. I believe that this is exactly how they feel about you. *We know you a lying ass hoe*, and you have absolutely ruined Tory’s life.”⁸ (emphasis added). Defendant further endorsed that post by “liking” it from her own X account. Once again, Defendant’s statement is reasonably understood as asserting that

⁸ <https://x.com/holidayholidayK/status/1671979971953172492/video/1>

Ms. Pete lied under oath and falsely accused Mr. Peterson of shooting her and thus committing felony perjury because it refers to “Megan”—*i.e.*, Ms. Pete—as a “lying ass hoe” who “ruined Tory’s [*i.e.*, Mr. Peterson’s] life.”

60. The following month, on July 23, 2023, Defendant posted on her X account: “He shot her because his ego was bruised. She’s the bigger star...[sic] That’s never been a fact & dmn sure ain’t one today. Tory Lanez is behind bars presumed guilty getting better numbers and charting.” Defendant’s X post included images of Mr. Peterson and Ms. Pete’s respective Spotify profiles, which listed each artist’s amount of monthly listeners. Defendant’s statement is reasonably understood as asserting that Ms. Pete lied under oath about the fact that Mr. Peterson shot her, *i.e.* that it has “never been a fact” that Mr. Peterson shot Ms. Pete and that Mr. Peterson is “presumed guilty” as a result of Ms. Pete’s alleged false testimony and accusations. A true and correct copy of a screenshot of Defendant’s X post is exhibited below.



61. Then again, on August 7, 2024, after posting with reference to an entirely unrelated lawsuit a former videographer filed against Ms. Pete in April 2024 and Ms. Pete’s motions to

dismiss in that lawsuit, Defendant falsely stated on her X account: “Was Megan Thee Stallion caught trying to deceive the courts again?” (emphasis added). This statement is reasonably understood as asserting that Ms. Pete previously deceived the court, which is a defamatory reference to her prior testimony in the Trial, and thus that Ms. Pete lied under oath in her testimony at the Trial.

62. The above statements by Defendant (*supra*, ¶¶ 56-61) are false. Ms. Pete did not lie under oath in Mr. Peterson’s trial and did not falsely accuse Mr. Peterson of shooting her. The truth is that Mr. Peterson shot Ms. Pete. This has been confirmed time and time again, including by a unanimous jury verdict beyond a reasonable doubt. Defendant is the one who has lied—repeatedly. In doing so, she has maliciously defamed Ms. Pete by accusing her of the infamous crime of perjury and of egregious dishonesty in falsely accusing another of a felony, and thus caused substantial damage to Ms. Pete’s personal and professional reputation by subjecting her to hatred, ridicule, and disgrace.

b. Defendant Impugns Ms. Pete’s Mental Capacity And Falsely Accuses Her Of Suffering From Alcoholism.

63. Defendant’s malicious campaign of defamatory and harassing statements also encompassed statements falsely accusing Ms. Pete of being mentally incapacitated to such an extreme extent that she allegedly is in need of a guardian, and of suffering from alcoholism.

64. For example, on January 29, 2024, Defendant posted a statement to her X account wherein she stated: “Let me go find this receipt of Megan’s ex bestie telling me she wasn’t fcking t Farris that’s her guardian.” This statement is reasonably understood as asserting that Ms. Pete is mentally incapacitated to such an extent that she requires a guardian to make decisions for her. Worse, this statement is reasonably understood as asserting that Ms. Pete is engaged in a sexual

relationship with her purported guardian. A true and correct copy of a screenshot of Defendant's X post is attached below.



65. Later that day, Defendant posted a statement to her X account wherein she stated: “Ok, so back in 2020 I’m doing what I do now & a rumor was circulating that MTS [Ms. Pete] was fcking T Farris. I reported on it and since ole girl and her friends/family watched my show, one of her besties that I had an internet rapport with hit me. As you can see, she said it wasn't possible for MTS to be sleeping with T. Farris because he was her guardian... (like a father figure). I thought the verbiage was odd, but as time went on ***I realized MTS was slow and needed one*** so it made all the sense then.” (emphasis added). This statement is reasonably understood as asserting that Ms. Pete is mentally incapacitated to such an extent that a guardian needs to be appointed to make decisions for her. Moreover, the “receipt” Defendant referred to as proof Ms. Pete was engaged in a sexual relationship with her purported guardian disclaimed any existence of such relationship. Defendant made no effort to clarify or retract her earlier accusation in spite of her lack of evidence or basis in fact.

66. Then again, on July 30, 2024, Defendant posted a livestream to her X account wherein she stated: “What is Megan’s mental status? Does she have a guardian or not? **Has she been listed as a capable person? Has she ever been deemed, like, legally retarded?** Like anything

of the nature? Anything of the sort?” (emphasis added). Again, this statement is reasonably understood as asserting that Ms. Pete is mentally incapacitated to such an extent that a guardian needs to be appointed to make decisions for her.

67. The above statements by Defendant Cooper (*supra*, ¶¶ 64-66) are false. Ms. Cooper is not and has never been “slow,” “legally retarded,” or incapable, incompetent, or of an incapacitated mental state. She is not and has never been in any state or condition for which a guardian or conservator would be appropriate under any circumstance. She does not now have, nor has she ever had, a guardian or conservator.

68. Ms. Cooper’s false statements (*supra*, ¶¶ 64-66) are so removed from reality that they constitute inherently improbable assertions for which Ms. Cooper had no basis in fact. But she nonetheless made these statements, which are reasonably understood to assert that Ms. Pete suffered from mental defects so severe that she could not care for herself and required a guardian or conservator to be appointed to make decisions for her. Such statements are directly injurious to Ms. Pete’s personal and professional reputations.

69. Defendant Cooper has also falsely accused Ms. Pete of suffering from alcoholism. On November 3, 2024—nearly a week after Ms. Pete filed her Complaint in this action—Defendant posted a livestream wherein she addressed the allegations in the Complaint, accused Ms. Pete of unspecified “crimes,” and stated Ms. Pete was an alcoholic: “You ought to be somewhere for your alleged crimes, drunkie. Why do you even speak? Like does your liver even function well?” (emphasis added). This statement is reasonably understood as asserting that Ms. Pete is an alcoholic.

70. Defendant has also implied that Ms. Pete was an alcoholic by falsely claiming she comes from a family of addicts. For example, on an October 30, 2024 livestream hosted on her

Twitch channel where she admitted to making many of the false statements alleged here, Defendant stated: “When you have drinking seemingly running through a family, yes I did post certain questions to my page. Yes I did.”

71. Again, on or about the same day, October 30, 2024, Defendant Cooper posted on her Social Media accounts asserting that Ms. Pete comes from a family of “alcoholics. Because the fact of the matter is, you have a grandfather that was an alcoholic. Your daddy, was your daddy on drugs? Or was he in and out of the system? What was that for? Do you want to talk about that? Is stealing worse than drugs and shit?” Such statements are reasonably understood to assert that Ms. Pete suffers from alcoholism by virtue of having come from a family that suffered from addiction.

72. Although Ms. Pete has never denied that she consumes alcohol, Ms. Pete is not and has never been an alcoholic, has never been diagnosed as an alcoholic or having any alcohol use disorder, and she does not suffer from addiction. Defendant had no basis in fact to publish her defamatory statements to her over 100,000 collective social media followers accusing Ms. Pete of substance abuse issues.

Defendant’s Defamatory Statements Were Made With Actual Malice.

73. Defendant acted with actual malice because she made her defamatory statements with knowledge of, and/or reckless disregard for, the falsity of these statements.

74. Indeed, even after a jury found Mr. Peterson guilty beyond a reasonable doubt of shooting Ms. Pete on December 23, 2022, Defendant—who was fully aware of the guilty verdict—continued to falsely accuse Ms. Pete of having lied under oath about whether Mr. Peterson shot her. Defendant did so knowing that Mr. Peterson’s guilt had been established in a court of law

beyond a reasonable doubt. Accordingly, Defendant knew that her statements regarding Ms. Pete were false, or at the very least, recklessly disregarded whether they were true.

75. Defendant's malice in defaming Ms. Pete is also evident from the fact that she has admitted to spreading misinformation and falsehoods about Mr. Peterson's criminal act of gun violence against Ms. Pete. Defendant's falsehoods of and concerning Ms. Pete, as well as her misinformation campaign about the Trial generally, reflect Defendant's deep-seated ill-will toward Ms. Pete and her intent on pressing a pre-conceived and false narrative at the behest of Mr. Peterson. Among other things, Defendant has repeatedly promoted at least three false and debunked theories: (1) there was no firearm recovered at the crime scene related to the Trial, and if there was, the Los Angeles Police Department lost or misplaced it; (2) Mr. Peterson was not the person who shot Ms. Pete; and (3) Ms. Pete did not suffer a bullet wound as a result of Mr. Peterson's criminal assault, but rather suffered injuries as a result of stepping on broken glass.

76. For example, on October 28, 2024, Defendant stated on her X account: "[T]he GUN and BULLET FRAGMENTS associated with the crime have gone missing! Didn't I tell y'all tht [sic] the gun was never presented in court and tht ain't make no damn sense? They gave the serial number and breezed past it. Liiike, first off whose is it?? Origin point please."

77. Similarly, in a October 28, 2024 YouTube video posted to her account, Defendant stated: "How do you hold someone in prison when you don't have a damn weapon or what was supposedly coming up out of [Ms. Pete's] foot[.]" In that same video, Defendant also stated: "Y'all did not prove that she was shot in court. You did not prove that. You don't have any bullet fragments, and now you don't have a damn gun. So you don't have anything that would prove that this actually even took place. How fucking convenient." Defendant later states in the post: "The gun was collected at the scene and it was supposed to be processed. The bullet fragments were

taken out at the hospital, they say. Even though, do yall remember how long it took for charges to be raised? Them people had pulled that shit out of her foot, she done went home [...] That n***a didn't get charged until October [...] If they had pulled bullet fragments out of her foot or had she been stabbed, the police would have been called and a report would have been filed that very moment [...] That's not odd to anybody? [...] That don't even make no god damn sense. Let's go ahead and pull up the receipt, people. No gun[.]”

78. In a separate video posted that same day to her X account, Defendant stated: “Can you even prove that you was shot?”⁹ (emphasis added).

79. None of Defendant's statements above are true. A firearm was recovered at the crime scene related to the Trial, and it remains in the custody of the Los Angeles Police Department. Indeed, the Senior Property Officer of the Los Angeles Police Department's Evidence and Property Management Division confirmed in a sworn declaration in opposition to Mr. Peterson's writ of habeas corpus that the firearm remains in its custody. Defendant could have easily verified this information, but chose to ignore it and instead promulgated lies about the integrity of Ms. Pete's testimony at the Trial and the criminal investigation into Mr. Peterson.

80. The same is true for Defendant's blatant misstatements regarding Ms. Pete's injury. Time and time again, it has been proven that Ms. Pete suffered a gunshot wound to her foot committed by Mr. Peterson and did not injure herself by stepping on broken glass. Rather than acknowledging that fact, Defendant has doubled-down on her false theory and repeatedly published misstatements to her tens of thousands of fans across her Social Media Accounts. Indeed, a December 23, 2022 Los Angeles Times article noted that Defendant “showed no remorse

⁹ <https://x.com/MobzWorld/status/1851068034229956698>

for pushing the ‘Megan might have stepped on glass’ theory long after a surgeon had found bullet fragments in her foot[.]”¹⁰ (emphasis added).

81. It was not until after this suit was filed, that on November 19, 2024, Defendant — *for the first time*—**admitted** the falsity of these statements and shared the truth with her followers, stating: “[F]rom this day forward today is November 19th and the public has been made aware of this form, I have to acknowledge that the gun, the bullet fragments [...] the magazine and the bullet casings are with the LAPD.”¹¹ The “form” Defendant referred to is the October 31, 2024 declaration of Martin Preciado, the Senior Property Officer of the Los Angeles Police Department’s Evidence and Property Management Division, submitted in support of the California attorney general’s opposition to Mr. Peterson’s writ of habeas corpus. Mr. Preciado’s declaration affirmed under oath that the Los Angeles Police Department’s “Evidence and Property Management Division has the firearm, the firearm magazine, and all the bullet casings and the bullet fragments that were booked” in connection with Mr. Peterson’s Trial. Defendant should have already known this information to be true because it was consistent with the testimony Defendant heard at the Trial, wherein multiple experts—such as the doctor who operated on Ms. Pete on the night Mr. Peterson shot her and multiple forensics experts—confirmed the use of a firearm and presence of bullet fragments in Ms. Pete’s foot.

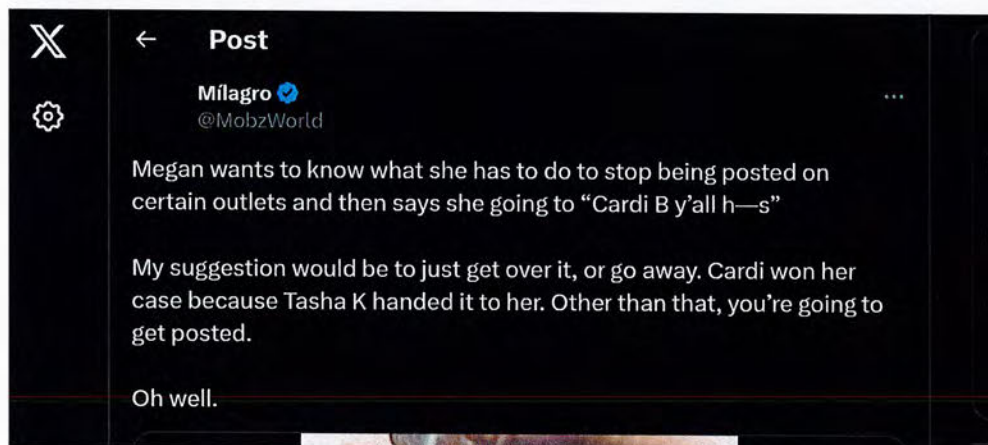
82. Defendant acted with actual malice because she promoted her false and defamatory statements due to her relationship with the Petersons wherein she acts as a spokesperson to spread misinformation on behalf of Mr. Peterson while he serves his ten-year prison sentence for criminally assaulting Ms. Pete.

¹⁰ <https://www.latimes.com/entertainment-arts/music/story/2022-12-23/megan-thee-stallion-tory-lanez-verdict-influencers-bloggers>.

¹¹ <https://www.youtube.com/live/s52R4xOIUY?si=e-OYCrcUDQgCxbRm>

83. Defendant further demonstrated actual malice by publishing and reiterating the false and defamatory statements out of pure hatred for Ms. Pete. Defendant's former best friend, King Noir, noted that Defendant has "a disdain for Megan[.]"¹²

84. Defendant also refused to cease making her false and defamatory statements after Ms. Pete publicly and repeatedly pleaded on her social media for individuals like Defendant to stop spreading such false misinformation. In response, Defendant posted on her X account: "Megan wants to know what she has to do to stop being posted on certain outlets [...] My suggestion would be to just get over it, or go away." A true and correct copy of a screenshot of this X post is below.



Defendant published and reiterated the false and defamatory statements out of a desire to gain notoriety, generate revenues and profits for her herself, and hurt Ms. Pete emotionally and professionally. Indeed, since Defendant began her campaign of harassment against Ms. Pete, her social media following and online recognition has grown exponentially, resulting in massive public exposure and the potential for advertisements and sponsorships.

¹² <https://thesource.com/2022/07/27/former-friend-of-milagro-gramz-blasts-her-for-allegedly-working-with-tory-lanez-in-smear-efforts-against-megan-thee-stallion/>

The Lasting Impact of Defendant's Defamatory Statements.

85. Defendant's false and defamatory statements regarding Ms. Pete lying at the Trial, as well as her mental competency and purported alcoholism, have caused, and continue to cause, Ms. Pete severe and substantial emotional and mental pain and suffering. Each time Ms. Pete sees media reports about the Defendant's lies, she must relive the worst experience of her life, resulting in emotional pain, anguish, and suffering. As Ms. Pete expressed on her social media, "Imagine how I feel waking every day seeing people LIE and turn my trauma into a joke? That whole team figures out ways to create doubt with my story every week and the media eats it up."¹³ Defendant's conduct at points during the Trial pushed Ms. Pete to contemplate suicide; as Ms. Pete recently recounted publicly that she "would rather not live through this than to have to live with this."

86. Additionally, Defendant's false, defamatory, and inflammatory statements have incited large swaths of her follows to personally attack Ms. Pete on social media based on Defendant's lies. For example, after Defendant falsely stated that the firearm and bullet fragments from the Trial "have gone missing" in her October 27, 2024 X Post, followers commented: "And everybody who defend that lying bitch said 'well he went to jail for gun possession' but this entire time there was no gun smh;" "So she ain't no bullet fragment foot ass bitch but a glass fragment foot ass bitch????;" "No Gun, No bullets, No case 🚫;" "This been old news ... that's how I don't understand how this man was convinced [sic] but the main evidence was 'missing'" In another X post from October 5, 2024 wherein Defendant questioned "who shot Megan?," Defendant's followers responded with attacks against Ms. Pete, including: "Everybody's walkin on eggshells around Megan bcuz they're afraid of offending the angry black woman stereotype! Most r Roc Nation bots n bullies. Actual victims don't behave that way. Close friends n industry peers kno

¹³ <https://x.com/theestallion/status/1352328565543510016>

she's a compulsive liar. We all know she's lying! 😂;" "Megan was never shot! Tory lawyers clearly worked for rocnation;" "Nobody believes Tory shot that horse. They made Tory been outstreaming her all year and the public still rock with him. Tell Marcus post her Spotify wrapped this year, I guarantee you Tory did more streams all while being shadow banned. Meanwhile she plastered on the front page."

87. The financial impact of Ms. Pete's emotional and mental pain and suffering ultimately will be an amount to be determined at trial in excess of \$75,000 exclusive of costs, interest and fees.

88. In addition to this harm, Ms. Pete's reputation for honesty has been called into question by Defendant's false and defamatory statements, not only in front of colleagues within the entertainment community, but in front of the public at large, including her millions of fans worldwide. As a consequence, Ms. Pete has suffered reputational harm that has affected and will continue to affect her both in her profession as a performance artist, as well as in future sponsorship and other business opportunities.

CAUSES OF ACTION

COUNT ONE Defamation *Per Se*

89. Ms. Pete repeats and re-alleges paragraphs 1 through 88 as if fully set forth here.

90. Defendant published a series of false and defamatory statements of fact of and concerning Ms. Pete to third parties, such as subscribers, viewers, and followers on her Social Media Accounts.

91. *First*, Defendant published false and defamatory statements accusing Ms. Pete of the crime of perjury and of egregious dishonesty in falsely accusing another of a felony. Specifically, Defendant stated:

- “At the end of the day, a bitch lying on somebody is low down [...] Yes she got hurt. And that’s cool. But how did you get hurt? How? And what are the circumstances? And what after that? So bitch, if you think I’m finna be sitting up here boo hooing for a bitch that played up in yall face. Not mine, because I always said her ass was lying. Bitch, I don’t. You think I feel sorry for the bitch? I don’t. The fuck? A bitch fuck with my n*a I’m a slap that hoe and whatever comes after it comes after it.”
- “All this case taught anyone was that your father, brother, cousin, or son could face over 20 years in prison without proper evidence, a botched investigation, & another ikely suspect just because non credible witnesses said you did something. & y’all slow asses cheering.”
- “He shot her because his ego was bruised. She’s the bigger star...[sic] That’s never been a fact & dmn sure ain’t one today. Tory Lanez is behind bars presumed guilty getting better numbers and charting.”
- “I believe that this is exactly how they feel about you, Megan. I believe that this is exactly how they feel about you. We know you a lying ass hoe, and you have absolutely ruined Tory’s life.”
- “Was Megan Thee Stallion caught trying to deceive the courts again?”

92. Defendant’s false statements regarding Ms. Pete’s testimony at the Trial described above are defamatory *per se* because they charge Ms. Pete with committing an infamous crime. A reasonable reader or listener of Defendant’s statements that Ms. Pete was “caught trying to deceive the courts again” and otherwise lied, fabricated or falsified her testimony during the Trial regarding Mr. Peterson’s use of a firearm or her wound from that firearm would understand them as charging her with perjury, which is a third-degree felony in Florida and an infamous crime. *See* § 837.02, Fla. Statutes; *Klayman v. Jud. Watch, Inc.*, 22 F. Supp. 3d 1240, 1247, n.3.

93. The false statements described above are also defamatory *per se* because they tend to subject Ms. Pete to hatred, distrust, contempt, and disgrace. A reasonable reader or listener of Defendant’s statements would understand them to mean that Ms. Pete falsely accused Mr. Peterson of committing felony assault with a firearm and gave untruthful testimony that resulted in Mr.

Peterson's wrongful conviction, which is a despicable manipulation of the justice system and would garner hatred, distrust, contempt, and disgrace from the public.

94. Finally, Defendant's false statements described above are defamatory *per se* because they tend to injure Ms. Pete in her profession. A reasonable reader or listener of Defendant's statements regarding Ms. Pete's egregious dishonesty in falsely accusing another of a felony would view Ms. Pete as untrustworthy and may hesitate before entering into professional contracts with her.

95. *Second*, Defendant published false and defamatory statements that stated Ms. Pete was or is mentally incompetent and required a guardian. Specifically, Defendant stated:

- "Let me go find this receipt of Megan's ex bestie telling me she wasn't fcking t Farris that's her guardian."
- "Ok, so back in 2020 I'm doing what I do now & a rumor was circulating that MTS [Ms. Pete] was fcking T Farris. I reported on it and since ole girl and her friends/family watched my show, one of her besties that I had an internet rapport with hit me. As you can see, she said it wasn't possible for MTS to be sleeping with T. Farris because he was her guardian... (like a father figure). I thought the verbiage was odd, but as time went on I realized MTS was slow and needed one so it made all the sense then."
- "What is Megan's mental status? Does she have a guardian or not? Has she been listed as a capable person? Has she ever been deemed, like, legally retarded? Like anything of the nature? Anything of the sort?"

96. Defendant's false statements regarding Ms. Pete's purported mental incompetency are defamatory *per se* because they subject Ms. Pete to ridicule and disgrace. A reasonable reader or listener of Defendant's statement that Ms. Pete was legally retarded, "slow," or required a guardian would come to ridicule Ms. Pete, as it implies Ms. Pete is unable to care for herself and requires round-the-clock medical assistance, which would also subject her to disgrace. Such statements are directly injurious to Ms. Pete's personal reputation.

97. Defendant's false statements described above are also defamatory *per se* because they tend to injure Ms. Pete in her profession. A reasonable reader or listener of Defendant's statement that Ms. Pete was legally retarded, "slow," or required a guardian would view Ms. Pete as unable to manage or sustain her own career as a mainstream and high-functioning performance artist, causing harm to her professional reputation.

98. *Third*, Defendant published false and defamatory statements that stated Ms. Pete was and is an alcoholic. Specifically, Defendant stated:

- "You ought to be somewhere for your alleged crimes, drunkie. Why do you even speak? Like does your liver even function well?"
- "When you have drinking seemingly running through a family, yes I did post certain questions to my page. Yes I did."
- Ms. Pete comes from a family of "alcoholics. Because the fact of the matter is, you have a grandfather that was an alcoholic. Your daddy, was your daddy on drugs? Or was he in and out of the system? What was that for? Do you want to talk about that? Is stealing worse than drugs and shit?"

99. Defendant's false statements are defamatory *per se* because they tend to subject Ms. Pete to hatred, distrust, ridicule, contempt, and disgrace. A reasonable reader or listener of Defendant's statements that Ms. Pete is a "drunkie" who comes from a line of alcoholics would come to hold Ms. Pete in hatred, contempt, and disgrace, as it falsely implies that Ms. Pete is an alcoholic who has a serious addiction that requires professional help.

100. Defendant's false statements are also defamatory *per se* because they tend to injure Ms. Pete in her profession. A reasonable reader or listener of Defendant's statements regarding Ms. Pete's alleged alcoholism would view Ms. Pete as unable to competently perform her duties as a mainstream performance artist, causing harm to her professional reputation.

101. Defendant's false and defamatory statements caused Ms. Pete to suffer and incur both presumed and actual damages, including loss and injury to her business, insult, pain,

embarrassment, humiliation, mental suffering, harm to Ms. Pete's name and reputation, out-of-pocket loss, and other actual damages in an amount to be determined at trial, but in no instance less than \$75,000 exclusive of interests, costs and fees.

102. Defendant acted with actual malice and/or reckless disregard for the truth for the following reasons:

- Defendant continued to accuse Ms. Pete of having lied under oath about whether Mr. Peterson shot her *after* a unanimous jury convicted Mr. Peterson beyond a reasonable doubt of committing felony assault against Ms. Pete, and with full knowledge of the jury's guilty verdict.
- Defendant pursued and published pre-conceived, false, and disproven narratives—such as Ms. Pete did not suffer a gunshot wound, Mr. Peterson did not shoot Ms. Pete, and the firearm at issue was lost or misplaced by the Los Angeles Police Department—as part of a campaign of misinformation and harassment against Ms. Pete, which demonstrates deep-seated ill-will and resentment. Indeed, the Los Angeles Times noted that Defendant “showed no remorse for pushing the ‘Megan might have stepped on glass’ theory long after a surgeon had found bullet fragments in her foot[.]”
- Defendant promoted her false and defamatory statements due to her conspiratorial relationship with the Petersons wherein she acts as a paid mouthpiece to spread misinformation on behalf of Mr. Peterson while he serves his ten-year prison sentence for criminally assaulting Ms. Pete. Indeed, Defendant implied that she is “still on [Mr. Peterson's] payroll,” and maintains regular contact with Mr. Petersons' father and lawyers. The Petersons also stated that Ms. Pete would be unable to prove that they are paying Defendant for her services.
- Defendant published and reiterated the false and defamatory statements out of a desire to gain notoriety, generate revenues and profits for her herself, and hurt Ms. Pete emotionally and professionally. Indeed, Defendant's social media following has grown exponentially since she began a campaign of harassment to defame Ms. Pete, topping over 100,000 followers across her Social Media Accounts.
- Defendant's attacks on Ms. Pete's purported mental competency and alcoholism issues are so far removed from reality that they are inherently improbable, baseless, and devoid of facts such that they are malicious and intended solely to impugn Ms. Pete's personal and professional reputations.
- Defendant demonstrated extreme ill-will against Ms. Pete and intended to cause her emotional, mental, and reputational harm. Defendant's former

best friend stated that Defendant has “a disdain for Megan,” which Defendant exhibited in her defamatory statements against Ms. Pete.

103. Defendant lacked reasonable grounds for any belief in the truth of her statements and acted negligently in failing to determine the true facts.

104. As a direct and proximate result of the Defendant’s defamation, Ms. Pete suffered substantial presumed and actual damages and loss, including, but not limited to, pain and suffering, emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, permanent damage and injury to her personal and professional reputations, loss of business and income, attorney’s fees, costs, and other out-of-pocket expenses in an amount to be determined at trial, but no less than an amount that exceeds \$75,000 exclusive of interest, costs and fees.

105. Defendant published or caused to be published, and has continued to promote, the false statements concerning Ms. Pete with the specific intent to cause harm to Ms. Pete and in order to boost her own reputation and social media following, and showing willful misconduct, malice, fraud, wantonness, oppression, or that entire want of care which raises the presumption of conscious indifference to consequences, justifying an award of punitive damages.

COUNT TWO
Promotion of an Altered Sexual Depiction,
Section 836.13, Florida Statutes

106. Ms. Pete repeats and re-alleges paragraphs 1 through 88 as if fully set forth here.

107. Ms. Pete is an identifiable person as defined under the statute. Ms. Pete is a performance artist who is recognizable as an actual person by her face, likeness, and/or other distinguishing characteristic(s).

108. The Deepfake Video is an altered sexual depiction as defined under the statute. It is a digital, electronic, mechanical, and/or other modification, alteration, or adaptation that depicts

a realistic version of Ms. Pete with computer-generated nude body parts presented as the nude body parts of Ms. Pete engaged in sexual conduct as defined in Section 847.001, Florida Statutes, in which Ms. Pete did not engage or participate.

109. Defendant willfully and maliciously promoted the Deepfake Video by transmitting, transmuting, publishing, distributing, circulating, disseminating, presenting, exhibiting, sending, posting, sharing, and/or advertising it on her X account. Defendant “liked” a post containing the Deepfake Video, which in turn resulted in that post being displayed on—and the video viewable from—the “likes” section of her X profile. Defendant then encouraged her followers to “[g]o to my likes,” where they could view the Deepfake Video.

110. Defendant admitted that she promoted the Deepfake Video. On June 8, 2024, Defendant went on her Stationhead account and stated: “If y’all want to be mad at something, this is what I’ll give you: be mad that I drew attention to it,” referring to her conduct in directing her followers to the Deepfake Video. Further, on June 9, 2024, Defendant shared a YouTube video to her account wherein she admitted that she “told whoever follows me on social media to go to my likes to see what it is that we’re discussing” with regard to the Deepfake Video. Taken together, Defendant willfully and maliciously promoted the Deepfake Video without Ms. Pete’s consent.

111. Defendant knew or reasonably should have known that the Deepfake Video was an altered sexual depiction. Indeed, on June 8, 2024, Defendant posted on her X account: “With the way deep fake and AI be going these days.....If it’s not her she should sue whoever made it. That sht [sic] dry af [sic] to do to people.” The “her” Defendant referred to is reasonably understood to mean Ms. Pete.

112. As a result of Defendant’s misconduct, Ms. Pete has been injured in an amount to be proven at trial.

113. Ms. Pete is entitled to recover monetary damages to include \$10,000 or actual damages, whichever is greater, as well as an award of Ms. Pete's reasonable attorneys' fees and costs, and a permanent injunction barring Defendant from any future use or publication of intimate visual depictions of her.

COUNT THREE
Intentional Infliction of Emotional Distress

114. Ms. Pete repeats and re-alleges paragraphs 1 through 88 as if fully set forth here.

115. Defendant engaged in extreme and outrageous conduct against Ms. Pete. Defendant's extreme and outrageous conduct consists of coordinating with Mr. Peterson—the convicted assaulter of Ms. Pete and a felon—his father, Sonstar Peterson, and Mr. Peterson's attorneys, to promote, distribute, spread, promulgate, communicate, and disseminate Mr. Peterson's false and disproven theories about Ms. Pete while Mr. Peterson serves a ten-year prison sentence. The false and disproven theories Defendant has spread on behalf of Mr. Peterson include: (1) there was no firearm recovered at the crime scene related to the Trial, and if there was, the Los Angeles Police Department lost or misplaced it; (2) Mr. Peterson did not shoot Ms. Pete; and (3) Ms. Pete did not suffer a bullet wound as a result of Mr. Peterson's criminal assault, but rather suffered injuries as a result of stepping on glass.

116. Defendant's conduct is extreme and outrageous because she acted on behalf of a convicted felon to spread the misinformation described above in order to harass his victim all while receiving a financial benefit from Mr. Peterson. Defendant has implied that she is "still on [Mr. Peterson's] payroll." Moreover, as Mr. Peterson's prison call logs demonstrate, Mr. Peterson has repeatedly discussed Defendant with his father. In one phone call, the Petersons confidently asserted that Ms. Pete would be unable to prove that Mr. Peterson paid Defendant for attacking Ms. Pete. Further, on information and belief, Defendant also coordinated with the Petersons to

employ online “bot” accounts to attack Ms. Pete and her supporters with hateful, derogatory, and malicious statements on social media.

117. Defendant’s conduct described above is extreme and outrageous because it goes beyond all possible bounds of decency and is regarded as shocking, atrocious, and utterly intolerable in a civilized community.

118. Defendant intentionally, and/or with reckless disregard of the high probability, caused Ms. Pete to suffer severe emotional distress. Defendant knew and/or should have known that the statements she shared on behalf of Mr. Peterson were false, untrue, debunked, and meritless. Indeed, on November 19, 2024, Defendant finally acknowledged the falsity of her statements and shared the truth with her followers, stating: “[F]rom this day forward today is November 19th and the public has been made aware of this form, I have to acknowledge that the gun, the bullet fragments [...] the magazine and the bullet casings are with the LAPD.”

119. Defendant knew and/or should have known that her extreme and outrageous conduct would cause Ms. Pete to suffer severe emotional distress. Defendant knew and/or should have known that Ms. Pete was susceptible to severe emotional distress regarding the false and disproven theories Defendant shared on behalf of Mr. Peterson, yet Defendant spread those theories nonetheless. Defendant was present for the Trial and heard Ms. Pete’s testimony. During her testimony, Ms. Pete stated: “Because I was shot, I’ve been turned into some kind of villain, and he’s the victim. This has messed up my whole life ... This whole situation in the industry is like a big boy’s club ... I’m telling on one of y’all friends, now you’re all about to hate me.” Ms. Pete further testified: “I can’t even be happy. I can’t hold conversations with people for a long time. I don’t feel like I want to be on this earth. I wish he would have just shot and killed me, if I knew I would have to go through this torture.” She also testified to suffering from suicidal thoughts

since the shooting. More recently, Ms. Pete stated publicly that she “would rather not live through this than to have to live with this,” referring to the false theories Defendant has spread on behalf of Mr. Peterson. As such, Defendant knew and/or should have known that her continued false statements regarding Ms. Pete and the Trial would, and did, cause Ms. Pete severe emotional distress.

120. As a direct and proximate result of the Defendant’s extreme and outrageous conduct, Ms. Pete suffered substantial presumed and actual damages and loss, including, but not limited to, pain and suffering, severe emotional distress and trauma, insult, anguish, stress and anxiety, public ridicule, humiliation, embarrassment, indignity, permanent damage and injury to her personal and professional reputations, loss of business and income, attorney’s fees, costs, and other out-of-pocket expenses in an amount to be determined at trial.

COUNT FOUR
Cyberstalking Injunctive Relief,
Section 784.0485, Florida Statutes

121. Ms. Pete repeats and re-alleges paragraphs 1 through 88 as if fully set forth here.

122. Defendant has communicated—both directly and indirectly—a course of conduct designed to cause severe emotional distress to Ms. Pete as laid forth herein. She has done so through electronic means and therefore meets the definition of cyberstalking pursuant to Section 784.048, Florida Statutes. Accordingly, she is entitled to an injunction against cyberstalking pursuant to 784.0485, Florida Statutes.

123. Ms. Pete incorporates by reference the attached affidavit as required by statute. *See* Exhibit A.

124. WHEREFORE, Ms. Pete seeks an injunction restraining Defendant from committing any acts of cyberstalking and harassment against her and providing any terms the

Court deems necessary for the protection of Ms. Pete, including any injunctions or directives to law enforcement agencies.

JURY DEMAND

Ms. Pete requests a jury trial on all issues to be tried.

PRAYER FOR RELIEF

WHEREFORE, Ms. Pete respectfully requests that this Court enter judgment in an amount for all damages owed to Ms. Pete, including but not limited to compensatory damages, punitive damages, statutory damages, attorney's fees, costs, interest, and all other damages as are just and proper, as well as declaratory judgment to remedy Defendant's unlawful behavior, and an injunction to prevent further misconduct.

Dated: February 10, 2025

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

/s/ Daniel L. Humphrey

Olga Viera (Fla. Bar No. 29783)
Daniel L. Humphrey (Fla. Bar No. 1024695)
olgaviera@quinnemanuel.com
danielhumphrey@quinnemanuel.com
(305) 402-4880

QUINN EMANUEL URQUHART &
SULLIVAN, LLP
2601 S. Bayshore Dr., Suite 1500
Miami, FL 33133

Mari F. Henderson (pro hac vice)
Julian T. Schoen (pro hac vice)
marihenderson@quinnemanuel.com
julianschoen@quinnemanuel.com
QUINN EMANUEL URQUHART &
SULLIVAN, LLP
865 South Figueroa Street, 10th Floor
Los Angeles, California 90017-2543
(213) 443-3000

Attorneys for Plaintiff Megan Pete

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No. 24-24228-CIV-ALTONAGA

MEGAN PETE, an individual

Plaintiff,

v.

MILAGRO ELIZABETH COOPER,
an individual,

Defendant.



**DEFENDANT'S ANSWER AND AFFIRMATIVE DEFENSES
TO THE SECOND AMENDED COMPLAINT**

Defendant, MILAGRO ELIZABETH COOPER, through her undersigned counsel, files this, her Answer and Affirmative Defenses to the Plaintiff's Second Amended Complaint and states the following:

NATURE OF THE ACTION

1. Denied.
2. Denied.
3. Denied.
4. Denied.
5. Denied.
6. Denied.
7. Denied.
8. Denied.
9. Denied.

II. THE PARTIES

10. Without knowledge, therefore Denied.

11. Without knowledge, therefore Denied.

12. Admit Defendant is a citizen of the State of Texas and a resident of Houston. Admit that Defendant uses the name Milagro Gramz and Mobz World. All other allegations in paragraph 12 are denied.

III. JURISDICTION AND VENUE

13. Without knowledge, therefore Denied.

14. Denied.

15. Denied.

IV. FACTUAL ALLEGATIONS

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Denied.

21. Denied.

22. Denied.

23. Admit that Defendant was present in the Courtroom during the duration of the trial.

24. Denied.

25. Denied.

26. Admit that Defendant has social media accounts. "Social media personality" is undefined and therefore denied.

27. Defendant admits to operating numerous social media accounts at one time or another. Defendant further admits that she has editorial discretion on what is published subject to the terms and conditions of the specific forum. Defendant also denies that she is the sole speaker, writer, and/or editor of every post on her social media accounts.

28. Denied.

29. Denied.

30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. Admit that Defendant uses the screen name @MobzWorld. All other allegations are denied.

43. Admit that the Defendant pressed like on an X post. All other allegations are

Denied.

44. Denied.

45. Denied.

46. Denied.

47. Admit.

48. Denied.

49. Admit that Defendant posted a video on June 9, 2024.

50. The YouTube video speaks for itself.

51. Denied.

52. Denied.

53. Denied.

54. Denied.

55. Denied.

56. Denied.

57. Denied.

58. Denied.

59. Denied.

60. Denied.

61. Denied.

62. Denied.

63. Denied.

64. Denied.

65. Denied.

- 66. Denied.
- 67. Denied.
- 68. Denied.
- 69. Denied.
- 70. Denied.
- 71. Denied.
- 72. Denied.
- 73. Denied.
- 74. Denied.
- 75. Denied.
- 76. Denied.
- 77. Denied.
- 78. Denied.
- 79. Denied.
- 80. Denied.
- 81. Denied.
- 82. Denied.
- 83. Denied.
- 84. Denied.
- 85. Denied.
- 86. Denied.
- 87. Denied.
- 88. Denied.

CAUSES OF ACTION

**COUNT ONE
Defamation Per Se**

89. Defendant re-alleges and reavers her responses to paragraphs 1 through 88 of the Second Amended Complaint as if fully set forth here.

90. Denied.

91. Denied.

92. Denied.

93. Denied.

94. Denied.

95. Denied.

96. Denied.

97. Denied.

98. Denied.

99. Denied.

100. Denied.

101. Denied.

102. Denied.

103. Denied.

104. Denied.

105. Denied.

COUNT TWO
Promotion of an Altered Sexual Depiction,
Section 836.13, Florida Statutes

106. Defendant re-alleges and reavers her responses to paragraphs 1 through 88 of the Second Amended Complaint as if fully set forth here.

107. Denied.

108. Denied.

109. Denied.

110. Denied.

111. Denied.

112. Denied.

113. Denied.

COUNT THREE
Intentional Infliction of Emotional Distress

114. Defendant re-alleges and reavers her responses to paragraphs 1 through 88 of the Second Amended Complaint as if fully set forth here.

115. Denied.

116. Denied.

117. Denied.

118. Denied.

119. Denied.

120. Denied.

COUNT FOUR
Cyberstalking Injunctive Relief,
Section 784.0485, Florida Statutes

121. Defendant re-alleges and reavers her responses to paragraphs 1 through 88 of the Second Amended Complaint as if fully set forth here.

122. Denied.

123. Denied.

124. Denied.

AS TO THE SECOND AMENDED COMPLAINT IN ITS ENTIRETY

125. All allegations not specifically admitted herein are hereby denied.

AFFIRMATIVE DEFENSES

126. As and for its first defense, for the reasons set forth in Defendant's Motion to Dismiss First Amended Complaint, Defendant asserts that the claims against her fail to state a claim upon which relief can be granted.

127. As and for its second defense, Plaintiff's libel/slander claim against the Defendant should be dismissed as all of the alleged defamatory statements attributed to the Defendant are at best non-actionable expressions of pure opinion and/or rhetorical hyperbole and/or truthful statements.

128. As and for its third defense, Plaintiff's libel/slander claim against the Defendant should be dismissed as the Plaintiff is a public figure and as such has failed to establish actual malice by clear and convincing evidence.

129. As and for its fourth defense, Plaintiff's libel/slander claim against the Defendant should be dismissed as Plaintiff has failed to establish that any of the alleged defamatory statements caused Plaintiff actual damages.

130. As and for its fifth defense, Plaintiff's libel/slander claim against the Defendant should be dismissed as Plaintiff has failed to provide statutory notice to the Defendant or the opportunity to retract any statement prior to the filing of the instant action.

131. As and for its sixth defense, Defendant's words and actions are protected by the First Amendment of the U.S. Constitution and Article I, Section 4 of the Florida Constitution.

132. As and for its seventh defense, Count II fails to state a cause of action for violation of Section 836.13, Florida Statutes as Defendant did not promote a deep fake video within the meaning of the statute. Furthermore, the statute is overbroad and infringes on Defendant's First Amendment Rights.

133. As and for its eighth defense, Count III fails to reach the necessary threshold of outrageousness required under Florida law to state claim for intentional infliction of emotional distress and fails to establish the requisite level of malice required under the First Amendment as mandated by *Snyder v. Phelps*, 562 U.S. 443 (2011).

134. As and for its ninth defense, Count IV fails to state a claim for cyberstalking under Florida Law and furthermore, injunctions are not available to stop someone from uttering insults or falsehoods. *See, e.g., Scott v. Blum*, 191 So.3d 502, 504 (Fla. 2d DCA 2016); *Concerned Citizens for Judicial Fairness, Inc. v. Yacucci*, 162 So. 3d 68, 72 (Fla. 4th DCA 2014); *Vrasic v. Leibel*, 106 So. 3d 485, 486 (Fla. 4th DCA 2013) (holding that an injunction remedy is not available to prohibit defamatory or libelous statements).

WHEREFORE, having answered Plaintiff's Second Amended Complaint herein and having raised affirmative defenses thereto, Defendant, COOPER, requests that this action be dismissed, and that Defendant, COOPER, be awarded her costs in the defense thereof as allowable by law and attorney's fees pursuant to pursuant to pursuant to § 836.13(5)(c), Fla. Stat., and such other relief as the Court deems appropriate.

Dated: February 20, 2025

Respectfully submitted,

PANCIER LAW

/s/ Michael Pancier
Michael Pancier (Fla Bar No. 958484)
mpancier@pancierlaw.com
Tel: (954) 862-2217
9000 Sheridan Street, Suite 93,
Pembroke Pines, Florida 33024
Co-counsel for Defendant,

UNITE THE PEOPLE, INC.

/s/ Michael R. Hayden
Michael R. Hayden, Esq. (pro hac vice)
(California Bar No. 343302)
(Not admitted in Florida)
michael@unitethepeople.org
(888) 245-9393
555 E. Ocean Blvd., Suite 205
Long Beach CA 90802
Co-counsel for Defendant,

CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing is being served this day on all counsel of record in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel who are not authorized to receive Notice of Electronic Filing.

By: /s/ Michael Pancier
Michael Pancier
Fla Bar No. 958484

TRANSCRIPTION OF AUDIOTAPE

1 · · · · · MS. COOPER: I believe that this is exactly
2 · · how they feel about you, Megan. I believe that this is
3 · · exactly how they feel about you. We know you a
4 · · lying ass hoe, and you have absolutely ruined Tori's
life. 5 · · Yeah, that's how they feel.






Milagro 
@MobzWorld



Don't take the bait and repost that sht

12:51 PM · 6/8/24 From Earth · **16K** Views

 View analytics




Milagro 
@MobzWorld

I think there are some ppl tht want it to be her....

Anyway

12:45 PM · 6/8/24 From Earth · **16K** Views

 View analytics




Mílagro 
@MobzWorld

...

With the way deep fake and AI be going these days.....

If it's not her she should sue whoever made it.
That sht dry af to do to people.

12:22 PM · 6/8/24 From Earth · **17K** Views

 View analytics

 **Post** Reply 

Mílagro 
@MobzWorld

With the way deep fake and AI be going these days.....

If it's not her she should sue whoever made it. That sht dry af to do to people.

1:22 PM · Jun 8, 2024 · **81K** Views

 27  78  215  23 





Milagro 
@MobzWorld

Y'all be bout to bust a nut hoping a btch sues me for these synthetic wigs. *Yawn*

I called that bait from the jump. It's not illegal to say go to my likes so that social media users could see what I was referencing.

Who posted the tweet an hour before it was brought to my attention? Oh.

I even stated that she should pursue charges against whoever did it because that's so wrong to do to people.

Never redistributed the content or asserted that it was her in it.

Lmfaooooo enjoy yall sorry ass day



2:56 PM · Jun 8, 2024 · 76.1K Views









Responses

I. RESPONSES TO INTERROGATORIES

A. Failure to Identify Fact Witnesses

AT&T Policy: Wireless usage, including talk, text, and data history, is available for up to 16 billing periods.

****iMessage Metadata was collected using paid subscription service software iMazing and are attached.****

****WhatsApp Metadata was collected using the WhatsApp platform.****

Sonstar Peterson

Call Log and Text/WhatsApp History have been uploaded to Dropbox.

****I told Sonstar that I would email him the interview questions, but I don't have access to that email, I may have ended up sharing a note via Apple with him.****

All other emails have been attached.

Daystar Peterson

I cannot access phone records related to Daystar Peterson as they are outside of the 16 billing period time frame.

I do not have access to text messages sent from Daystar Peterson proceeding 12.21.22 due to me getting a new device. The uploaded iMessages are the extent of our text conversation.

I cannot access Instagram direct messages between Daystar Peterson and me related to my former account because it was suspended.

Instagram direct messages between Daystar Peterson and me related to my active Instagram account are attached.

Livingston Allen

Text messages between Livingston Allen and I are attached.

Instagram direct messages between Livingston Allen and I are attached.

Carl Crawford

I have spoken to Carl Crawford on Instagram Live streams he's hosted. I do not have links nor access to these live streams.

A particular conversation beginning on Instagram Live spilled over into the direct messages. ***Those Instagram direct messages are uploaded.***

What I have provided are all of my communications with him via phone, text, social media, etc.

Cesar McDowell

Cesar has people that send emails and make calls on his behalf. I have uploaded emails sent to me with official court documents.

Anyone who also received emails was solely at the discretion of Unite The People.

There was a group chat at one point in time, but it didn't work out. I have a new device and no longer have communications from that thread.

Chelsey Rozier

-Chelsey Rozier and I had back and forth exchanges via direct messages on Instagram. She became aware of me as a fan of my show as described by herself. I have the portions of our conversation where she asserted that Travis Farris was Megan Pete's legal guardian because I covered the situation on my platform. The video with direct link is available and I am willing to testify to the fact that they are authentic and from her:

'Mob Radio Responds to Megan Thee Stallion' (Timestamp: 49:04)

<https://www.youtube.com/live/BhbMJoAGhv8?si=-UBVREUaVNF3a7zP&t=2467>

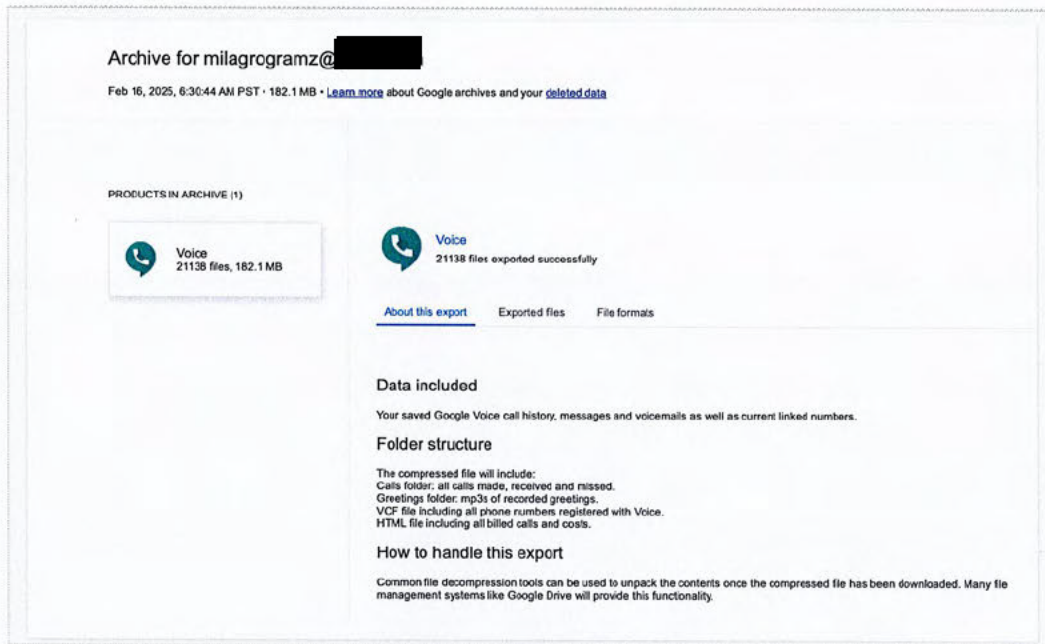
The associated Instagram page where we initially spoke has since been suspended.

Fact Witnesses

-I began using Google Voice as a hotline of sorts for listeners in 2020. I chose the number **614-MOBBISH(614) 662-2474**, and began advertising and taking calls at this number.

There is no way for me to ascertain the exact date I signed up, but I was able to go back through my logs and the first call and text occur in early April of 2020.

Attached are the relevant call/text/voicemail logs as provided by Google 'Takeout' Services.



Listeners from all across the world, literally, would call and send me text messages wanting to give alleged tips and opinions. These are not people I have a personal relationship with, but they would make it clear that they wanted to discuss Megan Pete and associated parties and alleged events.

II. RESPONSES TO REQUESTS FOR PRODUCTION

A. Incomplete Screenshots of Communications/Lack of Metadata

Links associated with the video/audio files and tweets come DIRECTLY from the associated platform; Instagram, X, and Stationhead

• 'Deleted Post.MOV' contains audio from a Stationhead stream and can be accessed via the following link: <https://share.stationhead.com/fg3zhby538jy> (Timestamp: 1:56:01)

• 'First Impression.MOV' contains audio from a Stationhead stream and can be accessed via the following link: <https://share.stationhead.com/p9kyr4zhktag> (Timestamp: 4:35:23)

- 'Sue The Culprit.MOV' contains audio from a Stationhead stream that can be accessed via the following link: <https://share.stationhead.com/gml715scl508> (Timestamp: 4:47:39)

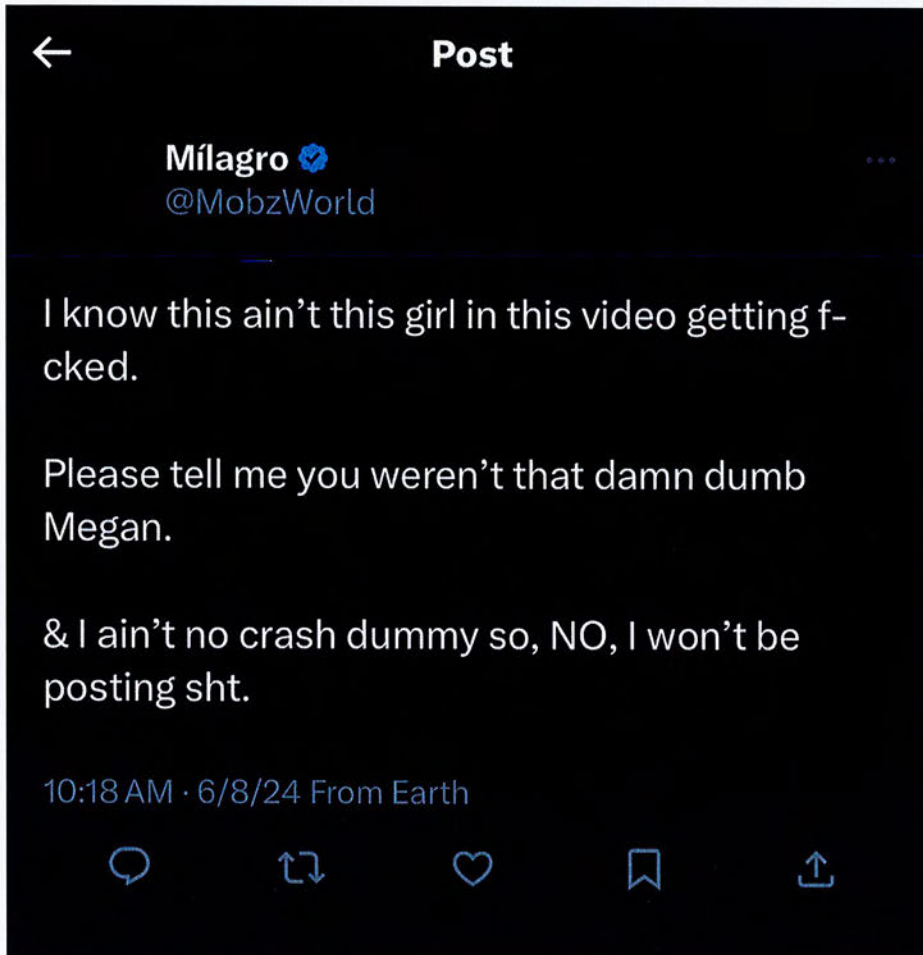
- 'BAIT.MOV' is a live stream from Instagram that can be easily verified and accessed via this link: https://www.instagram.com/reel/DBuBDzfxtUqzNopPD1VQa2UyygB_TTfqJbVgN80/

- 'Bait Cont.' contains audio from a Stationhead stream and can be accessed via the following link: <https://share.stationhead.com/i89kmljx85ul> Timestamp: (0:30:29)

- '10.29.24_video_Cgd6u9b.mp4' is a livestream from Instagram that can be verified here: https://www.instagram.com/reel/DBuBDzfxtUqzNopPD1VQa2UyygB_TTfqJbVgN80/?igsh=MWV6b3B6NjNkcjJwbA==

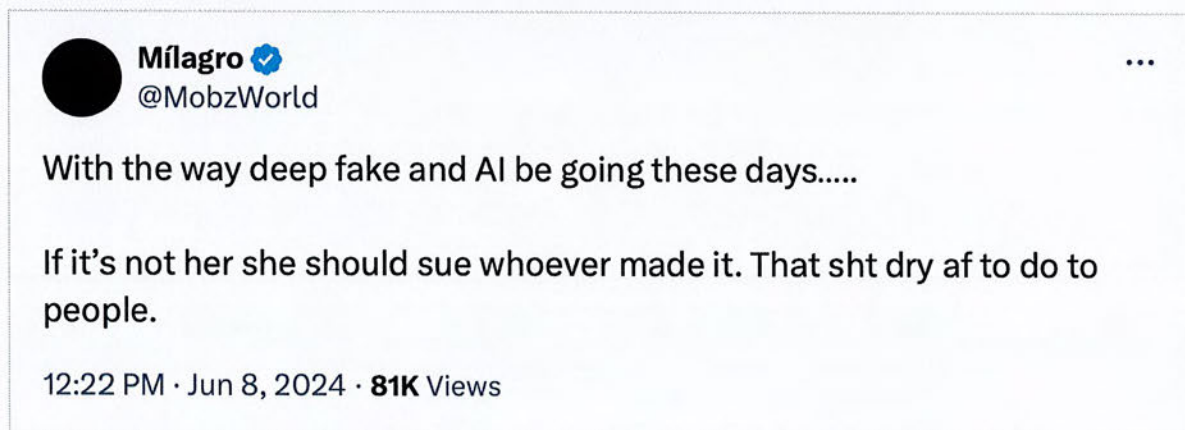
X Posts:

A.



I have not been able to locate this tweet via X

B.



<https://x.com/MobzWorld/status/1799492169763287282>

The metadata for the post you're referring to from the X post thread is as follows:

- **Post ID:** 1799492169763287282
- **Author:** Milagro @MobzWorld
- **Timestamp:** 17:22 UTC on 2024-06-08

C.



Milagro
@MobzWorld

...

I think there are some ppl tht want it to be her....

Anyway

12:45 PM · Jun 8, 2024 · **46.6K** Views

<https://x.com/MobzWorld/status/1799497989641093452>

The metadata for the post with the ID 1799497989641093452 from the user @MobzWorld is as follows:

- **Username:** Milagro
- **Handle:** @MobzWorld
- **Post Time:** 17:45 UTC on 2024-06-08

D.



Milagro
@MobzWorld

...

Don't take the bait and repost that sht

12:51 PM · Jun 8, 2024 · **47.2K** Views

<https://x.com/MobzWorld/status/1799499563926958377>

Based on the information provided in your query, here is the metadata for the post with the ID 1799499563926958377:

- **Post ID:** 1799499563926958377
- **User:** Mílagro (@MobzWorld)
- **Timestamp:** 17:51 UTC on 2024-06-08
- **Text:** Don't take the bait and repost that sht

• Communications with Chelsey Rozier are no longer directly accessible due to the associated Instagram page being suspended.

I did however, stream live and go through the direct messages with my audience. Chelsey Rozier still has the same page, so a subpoena of her records should show proof of my claims and our exchange. I am also willing to testify to these facts:

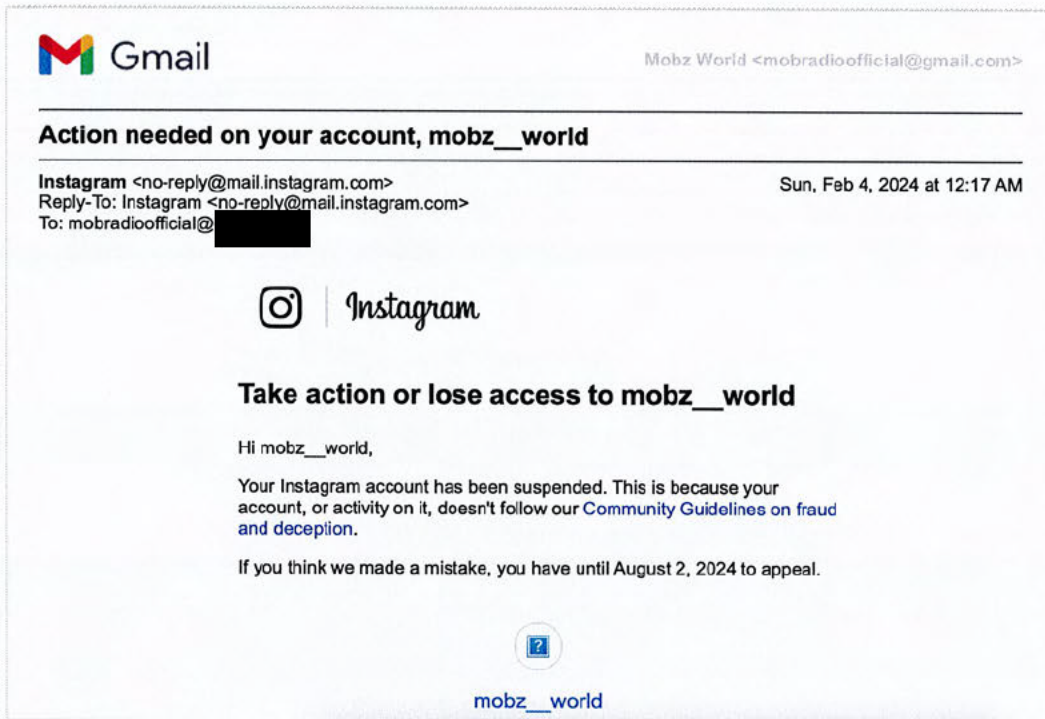
'Mob Radio Responds to Megan Thee Stallion' (Timestamp: 49:04)

<https://www.youtube.com/live/BhbMJoAGhv8?si=-UBVREUaVNF3a7zP&t=2467>

4. Locked Social Media Accounts

Social media accounts that *contained conversations with Chelsey Rozier, Karim York*, and others have been **suspended**, therefore I have no access to them.

I uploaded PDF files containing the emails and the original messages.

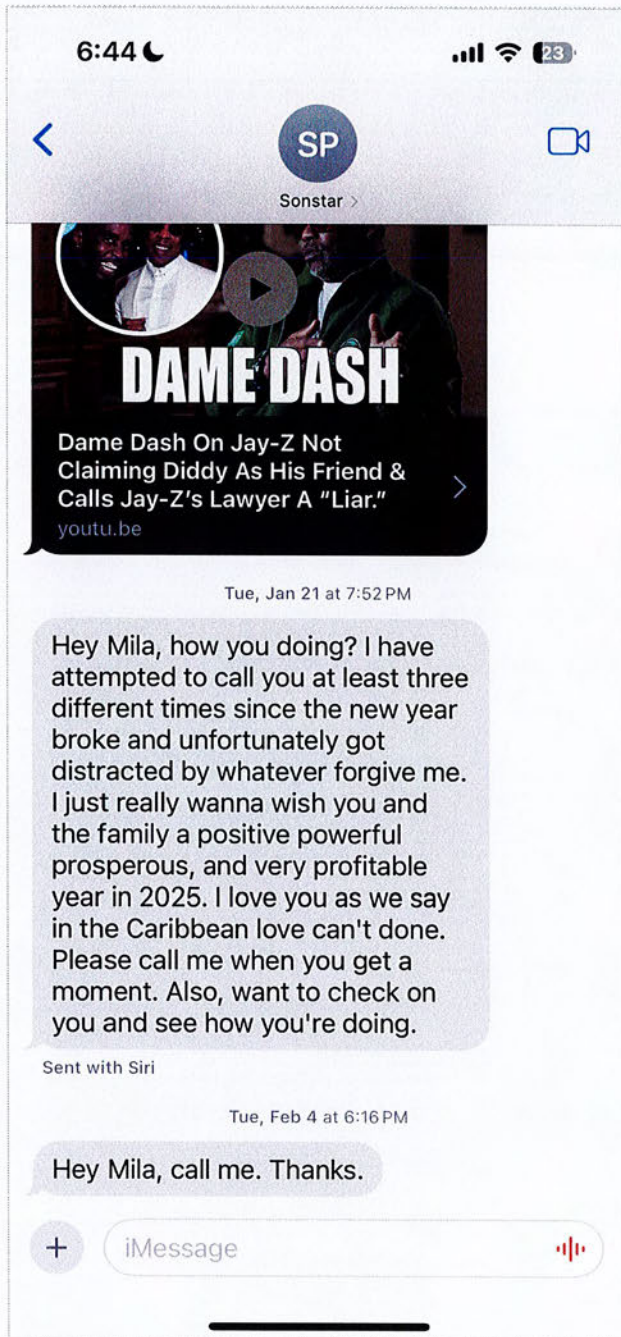


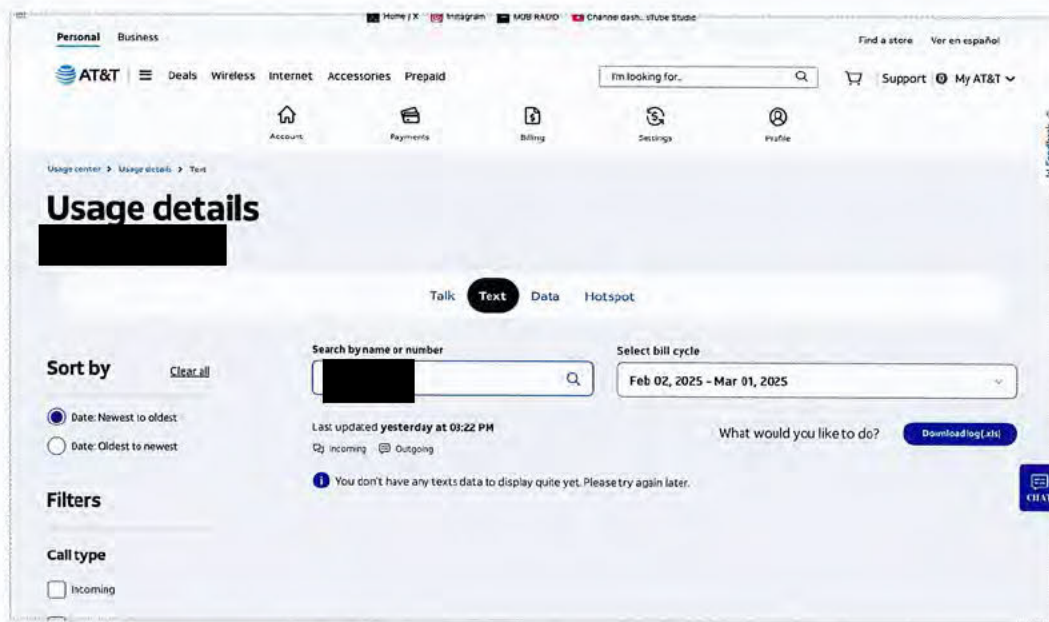
C. Lack of Phone Provider Information

The phone I use is registered to my husband, [REDACTED] As far as me being able to go in and retrieve records, the system only goes back as far as Oct 2, 2023.

Also, there are instances where trying to pull text messages from the phone company isn't giving a full scope of the interactions because they aren't documented.

For example, Sonstar sent me a message on February 4, 2025, but my phone bill doesn't reflect that.





D. Lack of Bank Account Information

Since at least 2015, my husband and I have shared a joint Chase account. Account # ends in [REDACTED]

Anything related to my work is linked to the Chase account that was already accessed. Account # ends in [REDACTED]

I also have a business account in my name with Chase Bank. Account # ending in [REDACTED]

I have a PayPal, Chime, Cash App, and Venmo account as well. I believe these have already been subpoenaed.

E. Lack of Deepfake Video Documents

-The day the deepfake video went viral I was streaming live on Stationhead. A listener in the comments claimed that a sextape featuring Megan Pete was going viral. As I'm asking questions listeners are commenting on Stationhead and Discord. (Due to Stationhead's interface I cannot retrieve comments from live shows.)

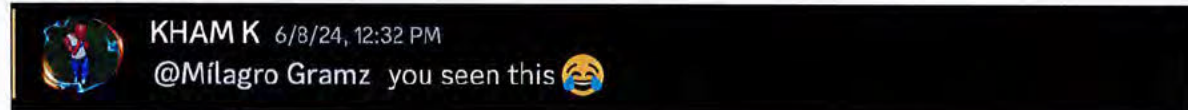
I cannot say if the same account that sent a dm (LV Don X Paris) is the one from the Stationhead chat, but I did receive a follow up direct message on Instagram with a link to the video.

I was tagged directly on a Discord server that I manage by a user named Kham K

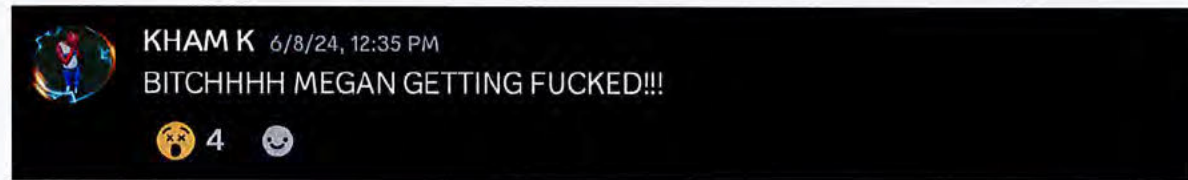
whose real name is Aleajandro Burnett. This user asserted that Megan was in the video and posted photos of her and the website hosting the video.

My tweets reflect my difference of opinion from any declarations that it was indeed her.

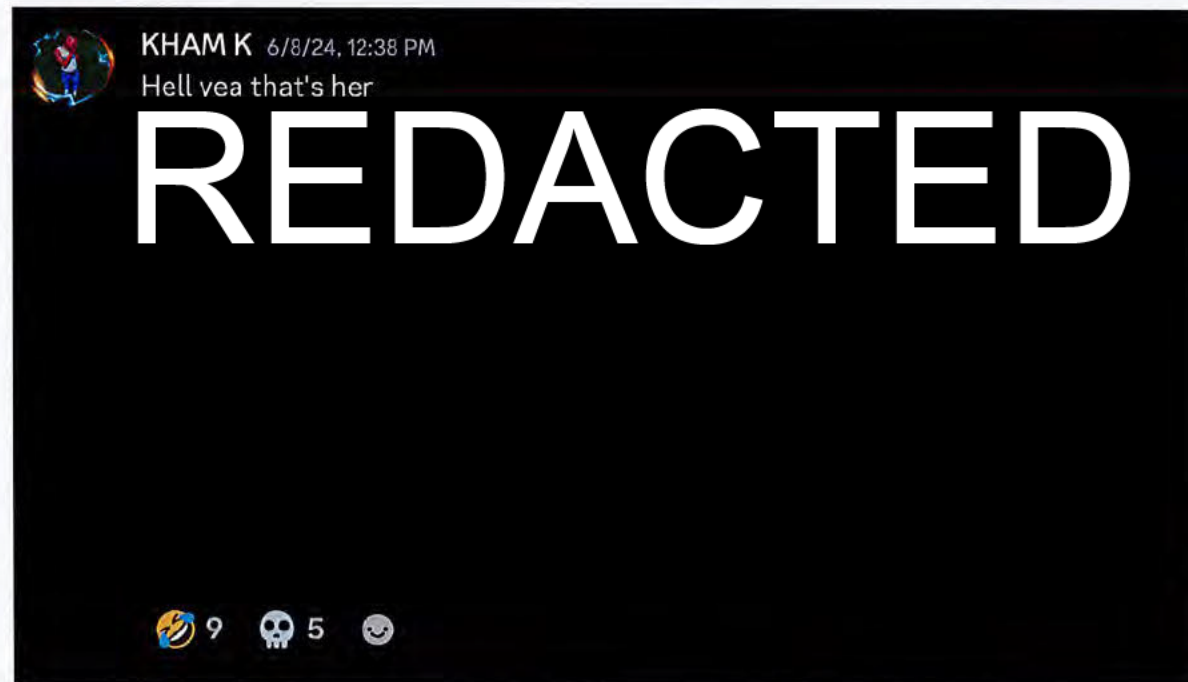
Attached are direct links to the discord posts and the direct messages from LV Don Paris. He is listed as 'Instagram User'



<https://discord.com/channels/883173647722881034/1003663622419005450/1249053554141040660>

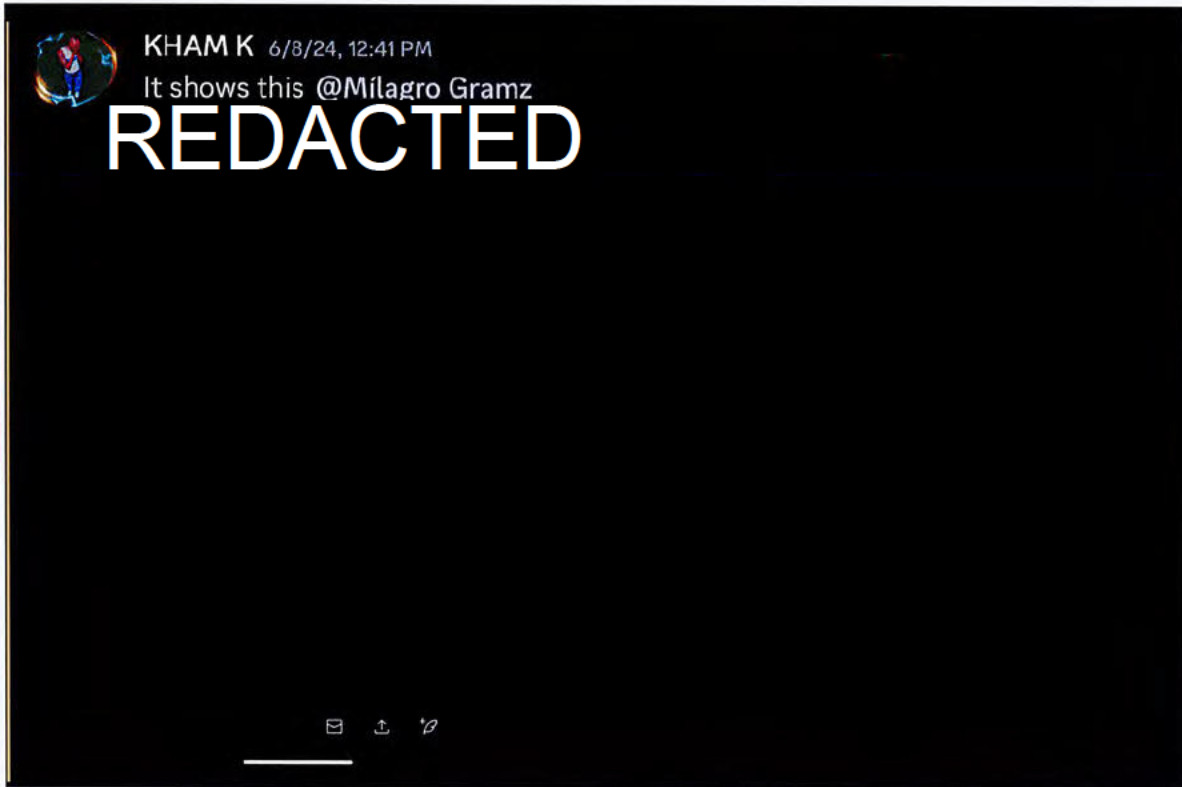


<https://discord.com/channels/883173647722881034/1003663622419005450/1249054124771905586>



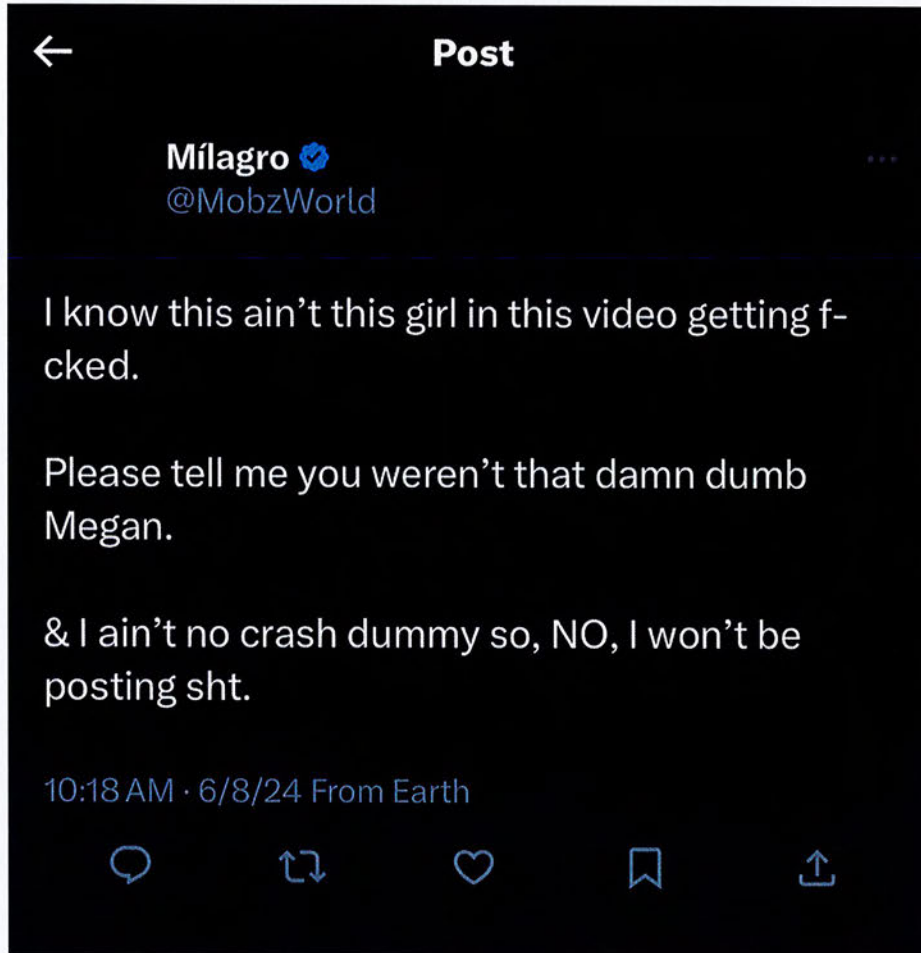
<https://discord.com/channels/>

883173647722881034/1003663622419005450/1249055070352445580

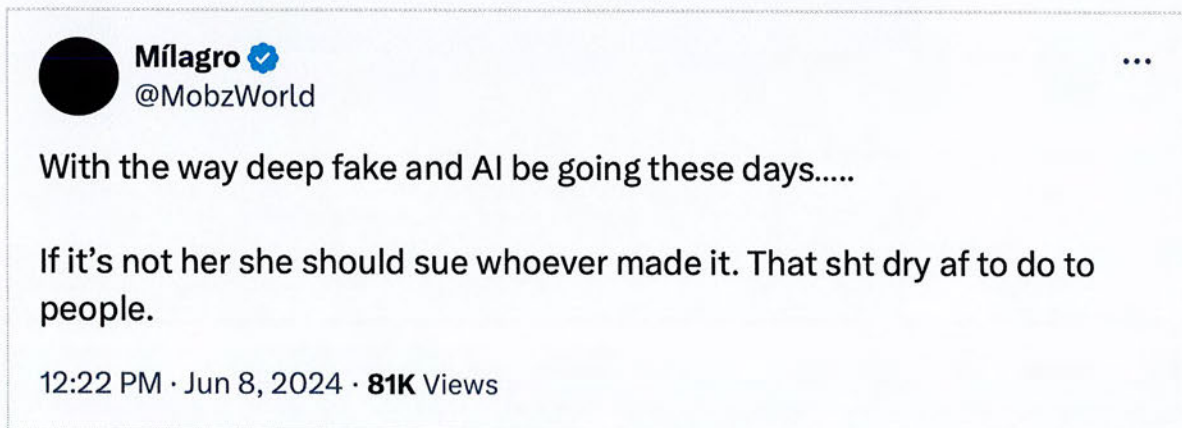


[https://discord.com/channels/
883173647722881034/1003663622419005450/1249055827336101978](https://discord.com/channels/883173647722881034/1003663622419005450/1249055827336101978)

A.



B.



<https://x.com/MobzWorld/status/1799492169763287282>

The metadata for the post you're referring to from the X post thread is as follows:

- **Post ID:** 1799492169763287282
- **Author:** Mílagro @MobzWorld
- **Timestamp:** 17:22 UTC on 2024-06-08

C.



...

I think there are some ppl tht want it to be her....

Anyway

12:45 PM · Jun 8, 2024 · **46.6K** Views

<https://x.com/MobzWorld/status/1799497989641093452>

The metadata for the post with the ID **1799497989641093452** from the user @MobzWorld is as follows:

- **Username:** Mílagro
- **Handle:** @MobzWorld
- **Post Time:** 17:45 UTC on 2024-06-08

D.



...

Don't take the bait and repost that sht

12:51 PM · Jun 8, 2024 · **47.2K** Views

<https://x.com/MobzWorld/status/1799499563926958377>

Based on the information provided in your query, here is the metadata for the post with the ID 1799499563926958377:

- **Post ID:** 1799499563926958377
- **User:** Mílagro (@MobzWorld)
- **Timestamp:** 17:51 UTC on 2024-06-08
- **Text:** Don't take the bait and repost that sht

III. RESPONSES TO REQUESTS FOR ADMISSION

I was featured in an HBO Special 'Five Shots: Megan Thee Stallion vs Tory Lanez' this was unpaid. The production company flew to Houston, provided lunch, and arranged the vehicle.

I interviewed with DJ Akademiks aka Livingston Allen. He provided my travel, hotel, and vehicle arrangements.

This is the extent of things I did or received concerning this case.

Defamation Claim

Megan Pete swore under oath to claims that I said, "..does your liver even function, drunkie? Shouldn't you be in jail for your alleged crimes?"

To further illustrate that this statement was about Meghann Cuniff, I have attached an email I received from someone I DO NOT know personally who had run a background check on her. This and online social media posts were why mentioned "alleged crimes."

Gmail - A Drunk ?

2/17/25, 10:38 AM



Milagro Gramz <mlagrogramz@gmail.com>

A Drunk ?

1 message

Mista Nephew [REDACTED]@gmail.com>
To: [REDACTED]@gmail.com

Mon, May 1, 2023 at 1:55 PM

Hey,

Since they wanna play here is some info on Cuniff

ALLEGEDLY ... keep it in ya back pocket incase she try to get nasty again . See if you can verify the info . Could be something to why she going so hard on this case.

Demetrius Scruggs
Mista Nephew Musik
CEO/Management
Mistanephewmusic.com
901.326.6889



MeghannMcarthurCuniff-TruthfinderReport.pdf
79K

12:48



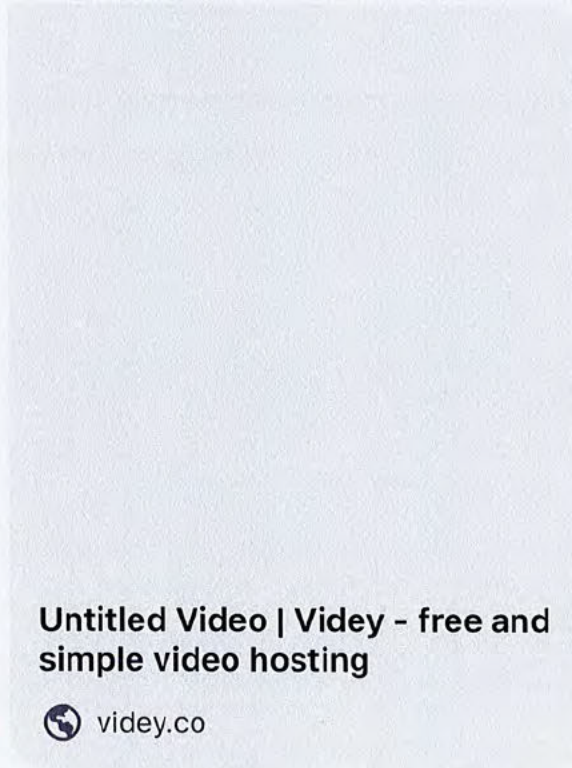
LV Don X Paris >
parisxladon



Results view. [Go to newest messages](#)


JUN 8 AT 2:36 PM

Someone just sent me this link to
MTS **Sextape**



**Untitled Video | Videy - free and
simple video hosting**



 videy.co

JUN 27 AT 1:30 PM

Replied to your story



Message...



DEF MG - 000494

Audio Transcript

Case Number: 1:24-cv-24228

Date:

In the matter of:

MEGAN PETE v MILAGRO ELIZABETH COOPER

Defendant Produced First Impression

**CERTIFIED
COPY**

Reported by:
Trent Kolka

Steno
Official Reporters

1100 Glendon Avenue
Suite 1850
Los Angeles, CA 90024
conciierge@steno.com
310.573.8380



M. COOPER
07/21/25
Exhibit 50-B
Ronny Zavosky

United States District Court
Southern District of Florida

Action No. 1:24-cv-24228

In the Matter of:)
Megan Pete v. Milagro Elizabeth Cooper)
_____)

TRANSCRIPTION OF AUDIOTAPE

Clip from Defendant Produced First Impression.mov

Recorded audiotaped clip of Milagro Elizabeth Cooper,
the Defendant.

Transcribed by
Trent Kolka

AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Defendant Produced First Impression

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Appearances

Milagro Elizabeth Cooper

AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Defendant Produced First Impression

1 MS. COOPER: They said, Millie, I just
2 inboxed you. Bitch, where? I know this dumb ass hoe
3 ain't did nothing like that. Where -- hold on. Tell me
4 exactly where to go. What page? But I have two
5 Instagram pages. Misinformation? Okay. Boom. I hate
6 their fucking system.

7 I may have found it. Let me see. You guys.
8 This -- oh my God. Do you think this will be AI? This
9 has got to be AI because I know this bitch is not this
10 dumb. And who would have been recording? But I don't
11 know. It don't look Fugazi. I'm under no -- let me tell
12 you something. I'm 80 steps ahead of ROC Nation. I'll
13 never post that on my motherfucking page.

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AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Defendant Produced First Impression

CERTIFICATE

I Trent Kolka certify that I was authorized to and did transcribe the above audio and that the transcript is a true and correct record of the audio provided. I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Trent Kolka T.K

Trent Kolka

Transcriber

2nd June, 2025

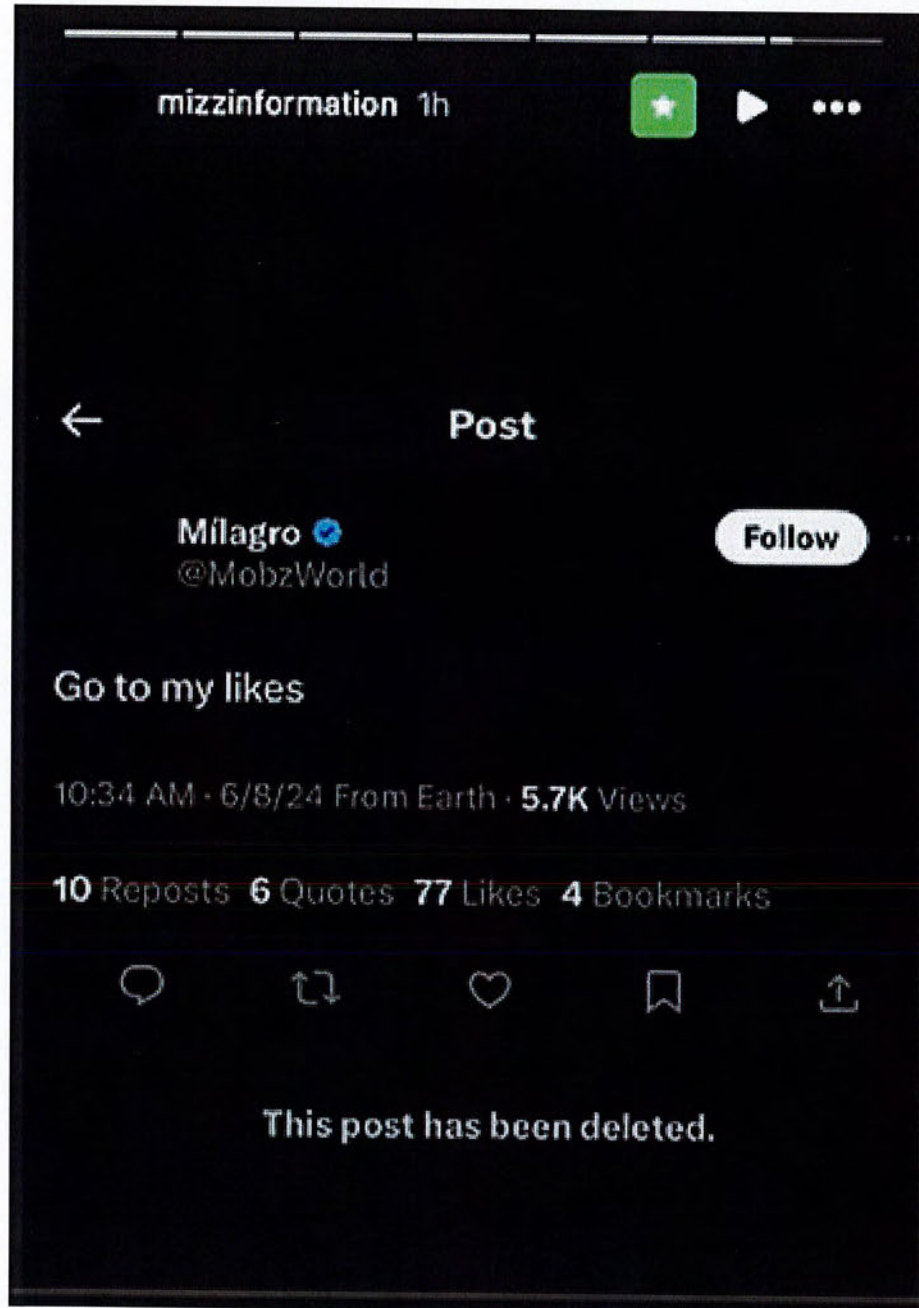
AUDIO TRANSCRIPTION - JOB NO. 1715349
MEGAN PETE v MILAGRO ELIZABETH COOPER

Defendant Produced First Impression

8	I
80 3:12	inboxed 3:2
A	Instagram 3:5
ahead 3:12	M
AI 3:8,9	Millie 3:1
ass 3:2	Misinformation 3:5
B	motherfucking 3:13
bitch 3:2,9	N
Boom 3:5	Nation 3:12
C	P
COOPER 3:1	pages 3:5
D	post 3:13
dumb 3:2,10	R
F	recording 3:10
found 3:7	ROC 3:12
fucking 3:6	S
Fugazi 3:11	steps 3:12
G	system 3:6
God 3:8	
guys 3:7	
H	
hate 3:5	
hoe 3:2	
hold 3:3	

TRANSCRIPTION OF AUDIOTAPE

- 1 · · · · · MS. COOPER: I'll never post that on my
- 2 · · motherfucking page. But I'll put it on my motherfucking
- 3 · · discord, though. But you under no circumstances if you
- 4 · · think you're finna have me post on social media. Whoopdiwhoopdiwhoopdi.
- 5 · · Hell no. But I will tweet about it. Hold on.



Audio Transcript

Case Number: 1:24-cv-24228

Date: October 30, 2000

In the matter of:

Megan Pete v Milagro Elizabeth Cooper

Pete_0001760 - Excerpt 2

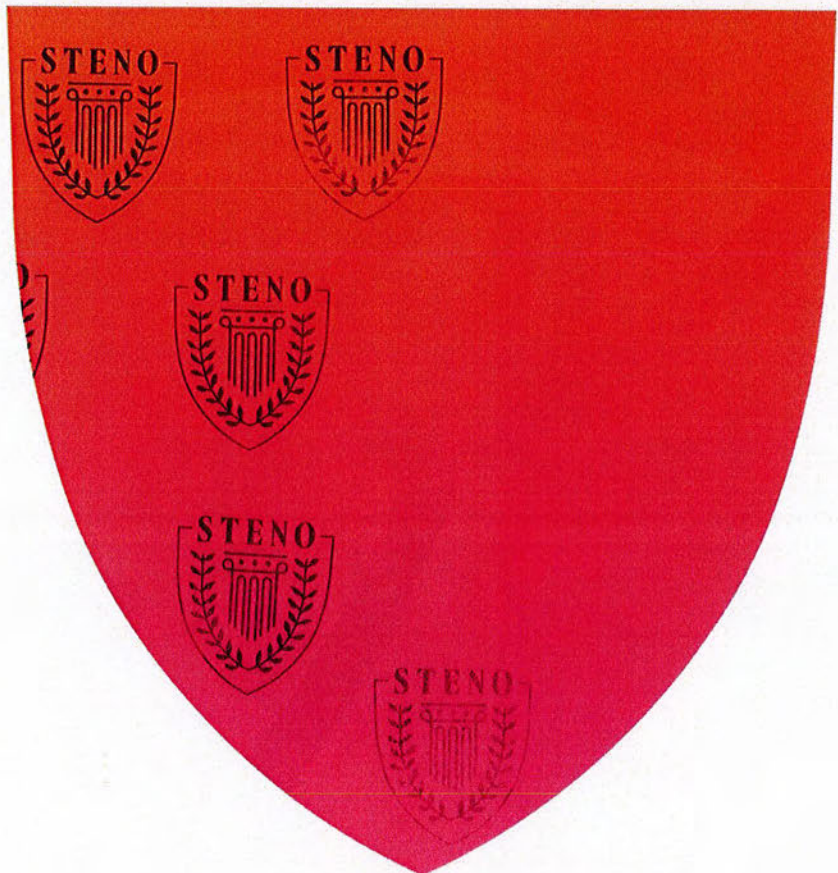


**CERTIFIED
COPY**

Reported by:
TERRI NESTORE

Steno
Official Reporters

1100 Glendon Avenue
Suite 1850
Los Angeles, CA 90024
concierge@steno.com
310.573.8380



1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF FLORIDA

3
4 MEGAN PETE, an individual,

5 Plaintiff,

6 vs.

Civil Action No.
1:24-cv-24228

7 MILAGRO ELIZABETH COOPER,
8 an individual,

9 Defendant.

10
11
12 TRANSCRIPT OF VIDEO RECORDING

13 MILAGRO ELIZABETH COOPER

14
15 File Name: Pete_0001760 - Excerpt 2

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20
21
22 STENO
23 concierge@steno.com
24 (888) 707-8366
25

AUDIO TRANSCRIPTION - JOB NO. 1850408
Megan Pete vs Milagro Elizabeth Cooper

OCTOBER 30, 2000
Pete_0001760 - Excerpt 2

1 MILAGRO ELIZABETH COOPER: So they told me go to
2 Meghann Cuniff's page to see what she posted, and she
3 posted something about Young Thug, but I'll look at that
4 tomorrow.

5 I actually am looking at the declaration.

6 So it says, I, Mr. Martin Preciado, do hereby
7 declare as follows: I'm a senior property officer of the
8 Los Angeles Police Department's Evidence and Property
9 Management Division, and in that capacity I've received a
10 request from Detective Eberhardt for a particular item
11 that was booked in connection with Daystar Peterson's
12 case.

13 As a result of the request on October 30th, I
14 queried and then looked into the number for the gun.

15 He said -- or into the system -- and said that
16 the query showed that the Evidence and Property Management
17 Division has the firearm, the firearm magazine, and all
18 the bullet casings and the bullet fragments that were
19 booked under this DR number and they're still in
20 Los Angeles's Police Department and in custody.

21 They said: I declare under the penalty of
22 perjury, under the laws of the State of Cali, dated on the
23 31st day of October, 2024.

24 Let me tell you why I think that's important.

25 Outside of any -- any questions you may have --

AUDIO TRANSCRIPTION - JOB NO. 1850408
Megan Pete vs Milagro Elizabeth Cooper

OCTOBER 30, 2000
Pete_0001760 - Excerpt 2

1 and I know what you want to get into -- and we'll talk,
2 but obviously not here, but we'll talk, though.

3 I know what reports said.

4 I think what's important, and obviously what
5 helps me -- duh -- would be the fact that it has been
6 established on wax when those things were said.

7 You see how I was able to go in the system and
8 show you that it's been reported that things are missing?

9 Okay. Everything that I said was prior to an
10 official declaration.

11 So I feel like if you have it now and that has to
12 be -- and let me pull this up on the screen, just to make
13 sure we all see it -- that -- that works in my favor
14 because it was widely reported that it was missing, and
15 now there's a form that makes it clear in 2024.

16 So in my, you know, humble opinion, if I started
17 saying after today that things were missing, that is
18 slander. That would be me intentionally going against
19 what this form says.

20 I have to now acknowledge this form from the
21 October -- and they just put this out today, but it's
22 dated on the 31st day of October? Let me tell you
23 something; if they had put this out and if this had been
24 declared during trial or any day before, maybe we would
25 have got into it. It's fine.

AUDIO TRANSCRIPTION - JOB NO. 1850408
Megan Pete vs Milagro Elizabeth Cooper

OCTOBER 30, 2000
Pete_0001760 - Excerpt 2

1 So from this day forward -- today is November
2 19th and the public has been made aware of this form -- I
3 have to acknowledge that the gun, the bullet fragments --
4 and what else did they say? The magazine and the bullet
5 casings are with the LAPD. I think that's great.
6 So now make it available for retesting and test
7 Kelsey. I think that's great. I think that's great.
8 And then I have one more question.
9 Will the -- the cop, the Detective Stogner that
10 testified at the preliminary hearing, is there some type
11 of ramification for saying that the bullet fragments were
12 missing? Let us know, girl. Meghann Cuniff, can you
13 update us? Hmm? Yeah.
14 So I mean, there's that. There's that. Child.
15 So anyway, they say he was under oath and he
16 lied. I don't know. I mean, it feels like perjury to me.
17 I don't know. I don't know. I don't know.
18 Um, actually, I'm going to have to get off my
19 phone. There's something I want to say, but I can't say
20 it. So meet me on Discord. We're gonna have to make us a
21 new chat. I want to say something so bad.
22 God literally is in my ear, bitch, saying, girl,
23 you better shut your motherfucking mouth. You better shut
24 up. Are you crazy? Because I see exactly what this is,
25 but okay.

AUDIO TRANSCRIPTION - JOB NO. 1850408
Megan Pete vs Milagro Elizabeth Cooper

OCTOBER 30, 2000
Pete_0001760 - Excerpt 2

1 I love you guys so much.
2 I'm gonna talk to you soon.
3 (End of recording.)
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AUDIO TRANSCRIPTION - JOB NO. 1850408
Megan Pete vs Milagro Elizabeth Cooper

OCTOBER 30, 2000
Pete_0001760 - Excerpt 2

C E R T I F I C A T E

I, TERRI NESTORE, Certified Shorthand Reporter/
Transcriptionist, do hereby certify that I was authorized
to transcribe the foregoing recorded proceeding, and that
the transcript is a true and accurate transcription, to
the best of my ability, taken while listening to the
provided recording.

I further certify that I am not of counsel or
attorney for either or any of the parties to said
proceedings, nor in any way interested in the events of
this cause, and that I am not related to any of the
parties thereto.

Dated this 19th day of July, 2025.

Terri Nestore

TERRI NESTORE, CSR 5614, RPR, CRR

AUDIO TRANSCRIPTION - JOB NO. 1850408
Megan Pete vs Milagro Elizabeth Cooper

OCTOBER 30, 2000
Pete_0001760 - Excerpt 2

1	cop 4:9	form 3:15,19,20 4:2	M
19th 4:2	crazy 4:24	forward 4:1	made 4:2
2	Cuniff 4:12	fragments 2:18 4:3, 11	magazine 2:17 4:4
	Cuniff's 2:2	G	make 3:12 4:6,20
2024 2:23 3:15	custody 2:20		makes 3:15
3	D	girl 4:12,22	Management 2:9, 16
30th 2:13	dated 2:22 3:22	God 4:22	Martin 2:6
31st 2:23 3:22	day 2:23 3:22,24 4:1	great 4:5,7	meet 4:20
A	Daystar 2:11	gun 2:14 4:3	Meghann 2:2 4:12
acknowledge 3:20 4:3	declaration 2:5 3:10	guys 5:1	MILAGRO 2:1
Angeles 2:8	declare 2:7,21	H	missing 3:8,14,17 4:12
Angeles's 2:20	declared 3:24	hearing 4:10	motherfucking 4:23
aware 4:2	Department 2:20	helps 3:5	mouth 4:23
B	Department's 2:8	Hmm 4:13	N
bad 4:21	Detective 2:10 4:9	humble 3:16	November 4:1
bitch 4:22	Discord 4:20	I	number 2:14,19
booked 2:11,19	Division 2:9,17	important 2:24 3:4	O
bullet 2:18 4:3,4,11	duh 3:5	intentionally 3:18	oath 4:15
C	E	item 2:10	October 2:13,23 3:21,22
Cali 2:22	ear 4:22	K	officer 2:7
capacity 2:9	Eberhardt 2:10	Kelsey 4:7	official 3:10
case 2:12	ELIZABETH 2:1	L	opinion 3:16
casings 2:18 4:5	end 5:3	LAPD 4:5	P
chat 4:21	established 3:6	laws 2:22	penalty 2:21
Child 4:14	Evidence 2:8,16	lied 4:16	perjury 2:22 4:16
clear 3:15	F	literally 4:22	Peterson's 2:11
connection 2:11	fact 3:5	looked 2:14	phone 4:19
COOPER 2:1	favor 3:13	Los 2:8,20	Police 2:8,20
	feel 3:11	love 5:1	
	feels 4:16		
	fine 3:25		
	firearm 2:17		

AUDIO TRANSCRIPTION - JOB NO. 1850408
Megan Pete vs Milagro Elizabeth Cooper

OCTOBER 30, 2000
Pete_0001760 - Excerpt 2

posted 2:2,3

system 2:15 3:7

Preciado 2:6

preliminary 4:10

T

prior 3:9

talk 3:1,2 5:2

property 2:7,8,16

test 4:6

public 4:2

testified 4:10

pull 3:12

things 3:6,8,17

put 3:21,23

Thug 2:3

Q

today 3:17,21 4:1

told 2:1

queried 2:14

tomorrow 2:4

query 2:16

trial 3:24

question 4:8

type 4:10

questions 2:25

U

R

update 4:13

ramification 4:11

W

received 2:9

recording 5:3

wax 3:6

reported 3:8,14

widely 3:14

reports 3:3

works 3:13

request 2:10,13

Y

result 2:13

retesting 4:6

Young 2:3

S

screen 3:12

senior 2:7

show 3:8

showed 2:16

shut 4:23

slander 3:18

started 3:16

State 2:22

Stogner 4:9

Milagro
@MobzWorld

Was Megan Thee Stallion caught trying to deceive the courts again? The answer is yes if you ask her former cameraman Emilio Garcia.

After Emilio filed a lawsuit alleging an unstable work environment, MTS filed to dismiss the lawsuit brought against her with the potential to have the case re-filed in New York. The thing is, Emilio is calling bullshit and says Megan is lying and lives in California. (He has hotel receipts, texts, and emails.)

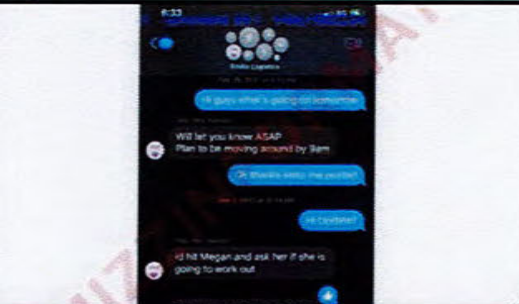
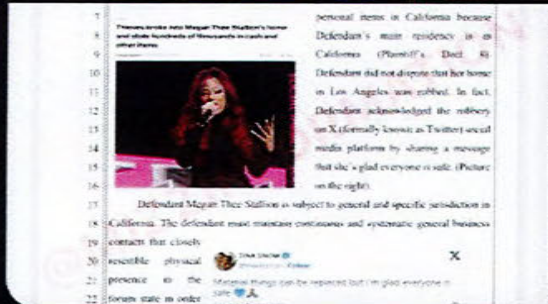


1. INTRODUCTION

5 In an attempt to avoid facing the allegations against her, Defendant seeks to shield
6 herself behind a flimsy veil of jurisdictional arguments, urging the court to dismiss this
7 case when it falls squarely within its rightful purview. This motion is Defendant's
8 misguided effort to evade accountability and should be denied. I her motion Defendant
9 is making the argument that "Defendant is not subject to traditional bases of personal
10 jurisdiction" and yet Defendant herself has publicly acknowledged that she lives in
11 California.

12 The Defendant has maintained substantial and deliberate contacts within the State
13 of California, making this venue not only appropriate but necessary for the fair
14 adjudication of this matter. Ignoring these connections would be to ignore the reality of
15 Defendant's actions and their impact within this jurisdiction.

16 Defendant is a celebrity with homes all over the country, however, Defendant's



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332



- Did you tell them that Tony and Kelsey bumped each other?

No

- Didn't tell det. Tony bumped Kelsey
- you mentioned Kelsey on the 16th

- Did you tell Gayle Tony bumped Kelsey?
Probably / Probably not

- Did you tell the det. Tony was in the car?
Head, torso, hand.

- Did you tell Stagner that Tony crossed over Kelsey?
Showed statement
"So you did see?"

Did you tell Stagner
he must of gone over her
to shoot me
I asked you earlier
you said no.

Did Tony have anything in the back?

- Shows Megan photo of the back of the car.

- Who's bags?

Luggage
Could belong to Kelsey / LV bag.

- Not sure if you have that bag.

Did you tell EJ to take bags out of his car and put them in Tony car.

Did you tell EJ to pack your clothes from Kyle house?

On July 16th In Interview did you say.

I didn't know I was shot,
didn't want to spread
misinformation.

- I didn't want to give fake info.

I didn't want to get no one in trouble

"See the paper"
don't recall.

4 days later attorneys talked
to police manager/you requesting
interview not be recorded.

Don't recall.
Do you recall Roc Nation being
on a call 2 days later w
Tory

2013/2014. 9 yr. friendship

Haven't seen Kelsey/only text
- phone call about meeting
w/ Tory.

When did you tell Kelsey you
left?

- Kelsey couldn't come in

- Only wanted Farris.

- Spoke before leaving

Why leave Kelsey stuck out

if yall only fell out b/c
she met tory @ hotel

Play Megan's live (green hair)
everybody in the car arguing.

Do you have evidence of what
Tory posted? that triggered
you?
Every time a blog he was
friends w/ posted I sent it

First 4 days did you send
something to anyone?

No
First 4 days

- putting out narratives.

So you weren't ~~feet~~ being
truthful when you said
Tory posted shit.

- IG live

I believed the dr was
telling the police
didn't wanna tell her

"her tone was rude"
You didn't want to give Gabr
into Did you see the shooter?
YES

Kathy Ta.

you told us earlier you were
private.

- I had to defend my name
ppr said I never was shot

- emotion posting: Angry
posting.

- When she spoke to you, you
were bleeding. ^{if you didn't care}
then, and not now

- Surgery
Anesthesia terrified
woke up lonely

Professional life:
Bic Tony has told so many
lies
No one wants to be associated
w/me my peers like a sick bird
your partner
"every since this shooting I've
become depressed. This affects
me.

Had anything else happened?
that could have made
Tony apologize.
Sit down NO

Nov. Kathy/Stagner
Do you remember telling
exactly where Tony was.

Yes. I didn't know which
door on passenger
@ hospital you said you & Tony
argued then Kels jumped w

asked twice about argument.
"I argued w/ Tony Kels was on
my side."

IG live video
why didn't you tell IG you
had already talked to police

Video plays. approach
upset that day ^{due} to accusations
- everyday ppl. say things to
me

I would have shot her too,
she a hoe.

page: Megan needs to be shot &
killed.

messages everyday. since
shooting.

If I would have known speaking
would mean losing my confidence
my friends etc. I would have
never spoke on it.

up and coming artists
but now you're a
superstar.

How did it affect your
career?

You claimed nothing else
happened for Tony to apologize,
but you argued.

The argument started b/c
of the sex revelation

were you upset about Kylie
and Tony being in the pool.

I 1st told the DA after they
asked me after Gayle.

You didn't know where he
was.

Closing: Megan wasn't worth
the hassle.

1st fight w/ Kelsey
 Any fight NO

Did you ever tell police
 Tony bumped ~~Megan~~ / Gayle
NO Kelsey

1st time now

Did you see them fight?
NO

Kelsey
 Harris

11:55am

Day 3

Daniel - Kelsey 5th amendment
 concerns.

Kelsey will not testify w/o
 immunity.

Will she use immunity?
 Will she face penalty? NO

- I don't care to be here today.
 - triggering situation / anxiety
 past - Darlun's death in the farm.
 - being lied on by Megan.
 "She said I betrayed her / bad
 friend / hush money"
 Accusations online: Accusations
 that I shot Megan. It's ridiculous.
 - early 2020 met
 - The very best of friends, / assistant
 meg, Tony, Kelsey all good friends
 met at Rocknation brunch.
 - met same time
 Tony and I had ~~connect to~~
 communications / meg encouraged
 it. We had sex.

Covid went now.

Megan set me up w/ Tony

"I don't know where Megan from"

Megan stayed during Covid.
Got close to Tony

Went back after Covid 2-3 months

- stayed at Megan's Airbnb

End of June back 2 wks.

"I had to get rid of my Houston home cause we're getting a house leave everything"
Sub-Lease.
Suitcase.

Couple days before the 12th they got an invite.

The 11th of July 3/4pm.

- EJ, Megan and I went to Kylie's house
not a party / hangout

- Megan wanted to cook nachos.

3-4 ppl, played beer pong
Megan "you having fun w/ me?"
Don't know about the nachos.

How many ppl? maybe 5-6"
- a lot of alcohol. blurry.

I last remember Meg's demeanor
I did pass out a while after
2-3 hours maybe.

- Woke up more sober
me, EJ, Meg, Kylie, Tony

Megan was drunk: demeanor
off. constant obnoxious
laughing.

~~EJ~~ Kelsey it's time to go.
Put pajamas on no bikini.

- tell Meg it's time to go.
bikinis and items in bag

Megan doesn't want to leave
Tory doing his thing. Flirting
w/ Kylie

ES said tell Meg come on.
She don't wanna go

- Tell her / her wig slipping
When she realized the wig
was messy she was more
willing to go.

She had ES move all bags
to car.

- Had not met Quan before
Bags were put in Tory's car

Tory still inside / She wanted
Tory to leave. He told Megan
to take them home.

Not that he didn't want to
leave. Didn't wanna get
in that car

Quan, Meg, and I leave
ES leaves in his car.

I called my sister, talking
about general things.
Excited about being at Kylie's
Megan was drunk and
obnoxious at

more level by this time.

Megan said I left a slipper
go back.

Megan went inside and
there was a fight / argument
rushed out: Meg / Tory

Bitch, Kylie said we gotta get
the fuck out

Kelsey outlines the seating
arrangement in the car

What happened?

Do I have to answer

Meg was rambling.
a lot of going back and forth between Meg/Tony and Kelsey
Name calling from everyone

Do you remember Tony suggesting something was being kept
Yes.

Megan said don't listen to him.

"I'm upset, confused."

They have a relationship and Meg and Kelsey argued about her disloyalty

She was attacking his career.

They argued about it

"me/Tony taking jabs"

(Kelsey was ^{drinking} taking Tony.)

Sept 2022 you spoke to me and another attorney.
Kathy TA

Did Tony say anything else.
Did Tony threaten to shoot you?
Yes.

~~Me:~~ Kelsey does not want to answer
Break

5th amendment.

"I don't know what I said when he said that."

Is there a reason you don't want to answer?

I don't want to be there.

Tony being here doesn't bother me

11:40
Back in at 1:35 pm.

Before lunch Tony threatened you
- some of those things I stated
weren't accurate or true
I can't remember.

I'm going back and forth with
him and him and Megan
argued.

I lied - NO that didn't happen

- On that day I said that
but I was under the influence.

- He said to me, reached towards
console, never pulled anything
out.

"If you shoot me you shoot me,
I guess it's my time to go."

Do you recall saying that
Tony reached for a gun.

"Just a motion, never
reached."

Did you tell us that he
reached for the console.

"I said things ^{that} weren't true"
just know I have people
that will defend me.

Did you talk about the argument?

- Tony called Megan Bitches, Hoos
and Kelsey defended her.

What happened after the
argument?

"I believe we pulled over" I don't
know which one wanted to
pull over.

The 1st time - Megan gets
out. Tony gets out behind
her and they talk.

I don't believe it was dead.
Megan and Tony got back in
relaxed.

Same seating.

Got back in and more arguing.
Blur about what the argument was about.

They argued about artistry.
play audio

You're only hot cause of Jack Harlow.

"me and me's arguing: you back doored me"

They stopped the car again
and this is where the shooting took place.

"There were gunshots"

Let these hoers out, let these bitches out, this my car.

That was the final thing he said.

Audio: Tony demands they get out.

they pull over."

Kelsey did Tony try to bribe you?
not, not me. I wouldn't say bribe
not about not saying anything

Did he mention 1 mil?

he mentioned 1 mil, but I don't know why.

Gunshots went off

you saw what happened during the shooting didn't you

"The way I was positioned, no"

We got back in the car
everyone told me to shut up because she was hysterical

he did not say I'll give you a million to stay quiet

-he mentioned a label deal

Did he try to bribe you any other time? Favors

I guess, I dk.

He offered to buy her an attorney.

Play the audio
"So anyway, very apologetic, you're wrong for what you did. I guess Molly - & do you wanna work with me, do you need a lawyer?"

No

What's something you wanna

Close. Shawn Molly advised
turn to word it that day.

Tony asked for a hug. She
can't want it.

Is that what happened?

No

When we stopped the 2nd
time, me & on get out
and I hear shots

Kelsey and me got out
they both get out on the
passenger side

What do you see?

I dk what I saw.

"I said things to protect
myself that night. I didn't
see anything."

Multiple gunshots

Then what?

"I'm trying to remember... I dk
she was on the sidewalk
and I went over."

Did you say you got out of
the car opened the door and
you heard 5 gunshots.

"I can't recount"

You said Tony jumped into
the front seat and after
the 3rd shot you looked up

and saw Tony?

"Again, I wasn't being truthful."

Audio: I look up at the 2nd or 3rd shot and I looked up and he was leaning over the door.

"That's what I told you."

Did you tell us that you saw Tony shoot over the door.

"I was drunk and it was a blur." BREAK
You said that

Did you see Tony shooting

"I didn't see him shooting."

Did you shoot Megan?

NO

Do you know who shot
Megan
NO

Did you shoot/hold/apologize
for a gun shooting

NO

Who apologized that night?
I don't recall an apology
that night?

After you saw Megan limp
over then, what?
I don't know.

Did you go check on her?
YES

Did you tell us that Megan
was bleeding?
"I don't know where it was
coming from."

Bleeding in driveway? NO

Did you tell us that Megan
looked up and saw you
looked like a deer in headlights?
YES

Did you tell us that he was
pointing the gun at Megan

After the shots did you
say everyone froze?
"Again, the whole night
was a blur."

I went into defense mode.
Did you tell us that he came
around the car and it was
scary?

I said a lot of things
Did you tell us that Tony
assaulted you, then you
picked you up like a doll?

Quinn said they do this all
the time."

Refresh my memory.

You told us a lot of things
in September."

I don't care to be here
and a sick baby, post partum

I was betrayed by Megan
upset she started hush
money rumors.

Did you tell us in September
that Tony assaulted you?

"I said that"
Did you say that he punched
or slapped you?

"Again I said a lot of
things."

Did you tell us that the
necklace broke then yeah.

Is that what happened?
"No"

"I don't know if it fell or broke
I just realized that it wasn't
on me the next day."

What happened to the chain?

"I don't know"

Did you tell us that the
rail broke

Yes. Didn't happen

Did you tell us that ~~stop~~
Tori pulled her and
neck hard.
It was a tug of war.

"Again, I said a lot of
things."

Did Oscar try to get you
back in the car.

NO

"We got in the car."

Did anyone approach you
and Mary in the driveway.

Blur.

What happened in the car?
[ok. Blur.]

Did you send text to Justin

YES

15 min break.

Back at 2:50 pm.

When you got back
in the car, can you tell
"Megan was injured."
"I didn't see Adam"

What's going on w/ you today
What happened from Sep to
today that you forgot
everything?

"I told you what I was going
through. I have a sick baby
and a funeral."

"I've never been around a
shooting."

You remember the heat you
get? Hate online.

"I take social media breaks"

"Between Sep and now I've
been through a lot."

Did anyone from defense
contact you from Sep
NO

Did you send a text?
"Yeah but I don't
remember what I said."

Did you send the text
to Justin.

Why did you send it.
"I panicked."

Why did you tell Tony
shot Megan?
"I made assumptions"

Did you tell us in Sept. that
you texted Justin for help
cause he shot Megan?
Her. "I didn't see Tony shoot

Did you tell them to take
Megan to the hospital and
Megan said call Farris
but sent txt cause signal
was bad?"

YES.

Did you try to send
location to Farris
Help.

Did you ~~txt~~ your mom, help?
YES

Did you also say you were
physically/emotionally broken
Don't recall

Were you injured that
night?

YES

How did you get injured?
"I saw it next day, don't
recall."

Show bruises on Kelsey's leg.

How did you get this bruise?
"I saw it the next day,
don't know how I got it."

Show another bruise. Head
photo hair missing, bruise
on arm.

Did you take these photos

YES cause I saw it

Have you gotten bruises
drunk before.

YES

You told us that you had
bruises from Tony assaulting
you?

YES

Why did you take a photo
of your head?

- Cause I was bald, but I've
gotten bald spots before.
I wear a lot of ponytails.

You tried to call a person
you were talking to.

YES

Cause you were scared
and didn't know what was next
Yes, but of the police

I called them when police
came.

Megan had her leg on me.
We got in the back.

Did Megan bleed on you?

Idk

Show Kelsey photo of blood
on her leg.

Was Megan was bleeding
in the car

NO

Show photo of Blood in
car

do you recognize this.

NO

were these bloody towels in
the car.

To my knowledge, no

That's my suitcase Idk
whose blood it was.

Was Megan bleeding
YES

Idk where from. Never
asked where she was
bleeding from.

Did Tony say shut up, yes.
yes because I was crying
and drunk.

Once sirens came up Tony
said I have a big deal
coming I'll give ~~at~~ you
a mil each.

In September you knew,
but not today

~~What~~ were you truthful that
day: "About some things"

"I wasn't truthful to protect
myself."

What are you protecting
yourself from?

"A variety of things"

I don't want to incriminate
myself.

Did you shoot Meg
NO

What weren't you truthful
about?

"I didn't see him do it."

Now does that incriminate
you?

were you scared to come
up here.

NO. Rather not be in
Ja. Let gives me anxiety.

Kelsey you understand you
are under oath?

YES

You didn't realize that
Meghan was bleeding.

NO

was anyone else bleeding
IDK Didn't see anyone
bleeding

"I did NOT see Tony shoot
Meg."

I was in a panic and
sent it.

Why say he did it?

Panic

were you in a panic in ~~Sept~~
NO

Did Megan say huh after
Tony offered 1 mil?

Idk

When police came they
were aggressive. Kelsey
told officer don't put a
knee in my back

Adrenaline high after
handcuffed and wasn't
worried about yourself at
the time.

YES

You didn't think about yourself
worried about Megan.

"I was taken to the County
jail."

were you swabbed for
gunshot residue?

I don't remember that.

"I asked for a lawyer
saw it on TV."

Meg's manager Gillie
picked her up and took
Kelsey by her place.
"Phenolase"

Shirt ripped, a blur don't recall.

Didn't you say cause of the fight? Yes.

Did Quan say something to you?

YES

Kelsey had to throw up.

after Gillie's house we went to the hospital.

"I didn't know anything about her injuries, just that she stepped on glass."

Did you txt her?

Idk, she was w/ her team "I asked them."

Got a call, realized Tony was on the call."

They play jail call

"Jail call I heard from him I tried to call Megan. Couldn't reach her."

You asked the team can you see Megan and you were blown off.

"Upset didn't know why I got blown off."

"They said LA was dangerous you should go home. Got her a flight back home."

Told prosecutors I was hurt and told them back.

When told to go back to Houston I was confused/angry.

~~At~~ Kelsey tried to cxt a place.

"In a hotel for 2 weeks, had no money and meg left and set her up w/ a place."

"I met w/ Tony and got my things. Tony was apologetic, but didn't say for what."

"Why didn't you feel safe w/ Tony and Saguan?"

"I wasn't trusting of anyone. Met him outside the hotel."

* Did you say Tony was upset about the attack on two artists? YES.

"I told him he was wrong" Did you tell us that he was wrong for pulling out a gun? NO

Did you say apologize to Megan too? NO

Did you say Meg's team was being weird, why am I out

the loop. I guess, don't remember telling you that.

When Tony apologized you said you're wrong?

"I don't remember telling you that."

Do you remember telling us that Tony offered you a job. investment. Word for word? YES.

PTSD from the police, and the gunshots.

Do you have PTSD from being attacked by Tony?

NO from the police memo.

Did you tell us that when he offered a job / he offered a chance and you said, I don't need anything from you

YES

Is that what happened
"I can't remember"

Tony's body language
changed
Attorneys talk.

Next question:

~~After offering money: blah, blah~~
think about it.

Did you tell us that business
offers happened over the
course of a few phone calls
NO

Offers until charges?
Don't remember.

Fell out w/ Meg ever?
Idk

Did you feel that Meg didn't
protect you enough?
Yes, but don't recall

The accusation that you
shot Meg is false.

Yes
Did you shoot Meg? NO
Did you release a statement?

DONE

Day 4 10:40

- Arguing about the photos shown and a text message
Tony's attorney
 - Violation of discovery code
 - Played audio w/ a transcript
- Sancton Late Discovery

Impeachment Evidence

- Had documents since March.

Asking for exclusion
Prosecution

- Call a witness out of order.

Text
"I got afraid for my life when he pulled my hair."

Dragged her out of the car
So the circumstances have changed

My's discretion

Want to call Dr. then Kelsey

Dr. Mariano 10:45

2010 @ Cedars. Sinai
ortho-foot doctor

July 12th 2020

"Megan came thru emergency, saw another doctor. Reviewed her situation and devised a plan for surgery etc.
we take X-rays, MRI's, etc."

Before taking images did you realize her injuries.
NO

3 X-ray images

1st left foot metallic foreign bodies on heel bone.

2nd image same pic/dif angle

3rd same foot left side

1 foot

if metallic bodies

Right Foot

Pic 1: smaller than a dime, under ankle

Pic 2: Side view

"We discussed treatment, debridement looked for major issues tendons etc."

our thinking was that the bullet fragments had the potential to infect her."

Risks?

"likely that she would cause pain constantly." Infection possible.
Always an option to take them out. "Needed surgery."

"megan had anesthesia"
any risks.

"We put Megan on the table, prepped and they did the operation, removing skin etc, removing fragments."

"Began with the right, but same time."

"We used a portable x-ray machine to make sure they got the foreign bodies."
1 hour surgery

-non removable stitches "Nylon"
let the other area heal on its own.

2-3 wks stitches

"there will be a scar" both feet.
Post op treatment?

"I didn't see her after surgery idk." She stayed in the room and was admitted.

How many times, have you removed bullet fragments?
"Several"

Showed us the medical report.
operative

Pull the x-ray back up.
what are these little specs?

"Metallic pieces too small to remove."

Cross

Did you speak to Meg that night
"No"

Is there a difference between bullets and fragments?

No

In the skin / soft tissue, then
stitches. Any nerve damage.

No nerve damage

DONE

Next witness: Kelsey. 11:10 am

Kathy Ta:

We talked about use immunity?
You understand that this
isn't blanket immunity, and
you can purge yourself.
YES

Was Megan shot?

Her team said glass. I assumed
it was gunshots.

You saw her limp to driveway
NO

You didn't shoot her correct
NO YES that's correct

Who shot her
NO

you plead the 5th why?
"to not incriminate myself"
I wasn't truthful.

about what
"the events of the night."
like what?

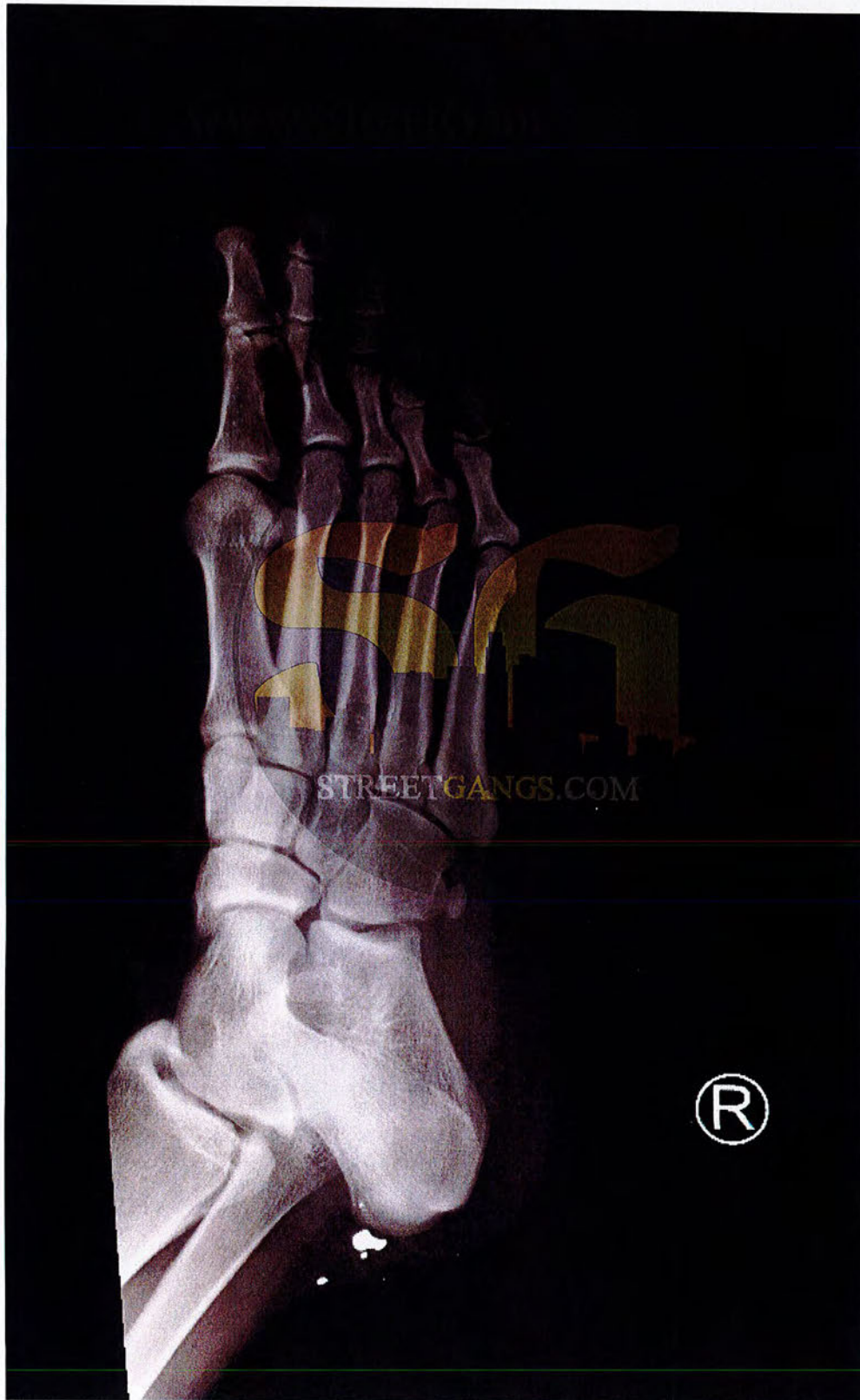
I was drunk.
Did you plead the 5th cause
you don't want to testify
YES

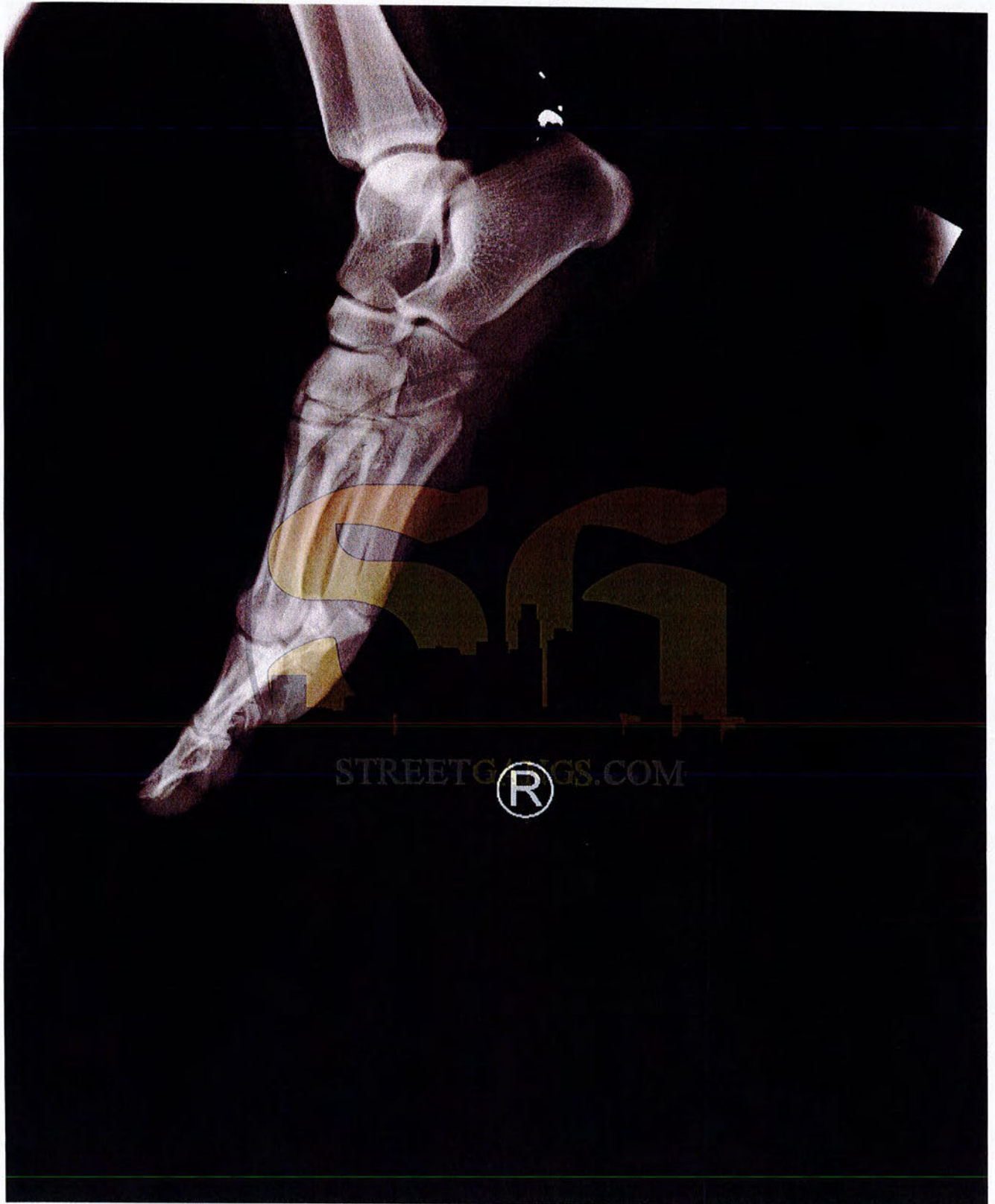
have you been harassed and
threatened, is that why you
plead the 5th
Her attorney steps up.
Can we approach, "no."

You plead the 5th that cause
you didn't want to be brought
back into the limelight, or
cause meg didn't back you
up, "no"
"I told the judge why"

In Sept you fell out w/ meg
behind hush money rumors
YES.

EXHIBIT	56
WIT:	Cooper
DATE:	7/21
RONNY ZAVOSKY, CSR 12359	





SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

ADMITTED IN EVIDENCE

DATE: DEC 21 2022 DNA ☐

TYPE OF HEARING: PRE TRIAL

CASE NO. PLB EXH. NO. 35A

BY: DEAN DEPUTY

SHERRI R. CARTER, EXECUTIVE OFFICER/CLERK
CRIM 129 (Rev. 07/13) (replaces CR 108)



07/12/2020 - ED to Hosp-Admission (Discharged) in 7-NE (continued)

Operative & Anesthesia Notes

Operative Report

Little, Milton Tm, MD at 7/12/2020 1520



OPERATIVE REPORT

DATE OF SURGERY: 7/12/2020

MRN: 202059740

PATIENT: Megan Pete

ATTENDING SURGEON: Milton Little, MD

ASSISTANT SURGEON: Phillip Beherens, MD, Lee Salvador Haruno, MD

PREOPERATIVE DIAGNOSIS: Gunshot wound bilateral lower extremities

POSTOPERATIVE DIAGNOSIS: same

PROCEDURE(S) PERFORMED:

- 1) Right lower extremity irrigation and excisional debridement wound size 1.5 cm
- 2) Right lower extremity removal of foreign body (bullet fragment)
- 3) Left lower extremity irrigation and excisional debridement wound size 4 x 4 cm
- 3) Left lower extremity removal of foreign bodies (bullet fragments)
- 5) Left lower extremity complex wound closure with wound size 4 x 4 cm

ANESTHESIA:

General

Anesthesiologist: Nguyen, James B, MD

STREETGANGS.COM

INTRAOPERATIVE FINDINGS:

- 1) 3 major bullet fragments (x1 on RLE, x2 on LLE)
- 2) Grossly intact achilles tendon on RLE
- 3) Left lateral heel 4 x 4 cm wound with with partial dermal loss

IMPLANTS: None

EBL: 5 mL

SPECIMENS: Bullet fragment x 3 (two from left, one from right)

DRAINS: none

TOURNIQUET: none





07/12/2020 - ED to Hosp-Admission (Discharged) in 7-NE (continued)

Operative & Anesthesia Notes (continued)

DESCRIPTION OF PROCEDURE: The patient was met preoperatively where her bilateral lower extremities were marked by a member of the surgical team and the consent and procedure were confirmed. She was then taken back to the operative suite where anesthesia was performed without incident. The patient was then transferred to a regular table in the supine position. All body parts were well-padded and secured. The patient received ancef for prophylactic antibiotics immediately prior to draping. The bilateral lower extremities were then prepped and draped in the usual sterile fashion. A multidisciplinary time out was completed to confirm site, procedure, and critical clinical factors.

We first turned our attention to the right lower extremity where she had an approximately 1.5 cm wound over her posterior ankle/calcaneus in the region of the Achilles tendon insertion. This wound was gently probed with a tonsil and with the assistance of fluoroscopy the bullet fragment was identified and successfully removed. Her Achilles tendon was noted to be grossly intact. A curette was used to debride any dead tissue and a sharp knife was used to excise the skin edges.

We then turned our attention to the left lower extremity. She was noted to have an approximately 4 x 4 centimeter soft tissue wound over the lateral portion of her calcaneus/foot, involving the full-thickness dermis in some areas. There were approximately three 1 cm areas which probed deeper into the subdermal soft tissues. There was no exposed bone or major neurovascular structures or tendons. Using a tonsil these wounds were carefully probed and the bullet fragments identified with assistance of fluoroscopy. Two 1 cm fragments were removed from the wound. Hemostasis was achieved with Bovie electrocautery. A curette was used to debride the wounds and necrotic skin edges were cut utilizing a knife.

The three bullet fragments were saved, packaged according to standard protocol and passed off to appropriate authorities. Multiplanar fluoroscopy was then obtained of the bilateral feet demonstrating successful removal of the major bullet fragments. There were tiny fragments of retained missile that were noted, however deemed too small to attempt retrieval.

We then proceeded to perform an excisional debridement of the left lateral foot wound. Using Metzenbaum scissors, nonviable/injured skin was carefully and sharply excised. The bilateral lower extremity wounds were then gently debrided with a curette. Each extremity was then irrigated with 3 L of normal saline.

A methodical wound exploration was performed. There were no retained instruments and all counts were correct. The wound on the right lower extremity was then closed with 3-0 nylon in simple interrupted fashion. The deeper soft tissue wounds on the left lateral foot were reapproximated with 3-0 Monocryl in interrupted fashion. The viable skin edges were then closed with 3-0 nylon in Allgower Donati fashion. It was felt after thorough inspection, that this wound bed was appropriate for healing by secondary intention. The wounds were then sterilely dressed with Xeroform, 4 x 8 gauze, ABD pads, web roll, and bias. The patient was then awoken without incident and taken to the recovery room in excellent condition.

POSTOPERATIVE PLAN:

We will plan for weightbearing as tolerated in the bilateral lower extremities with a postoperative shoe. She should continue to elevate her bilateral lower extremities for comfort. PRN pain control. Plan to continue antibiotics for 24 hours postoperatively. Follow-up postoperative x-rays. Plan for discharge tomorrow with *continued progress* and follow-up in clinic for wound check.

I, Milton Little, MD was the surgeon of record for the operative procedure and I was present for all critical aspects of the operative procedure.

B P. 34

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

ADMITTED IN EVIDENCE

DATE: DEC 21 2023 DNA ☐

TYPE OF HEARING: JURY TRIAL

CASE NO. BA990588

P10 EXH. NO. 36

BY: DEG DEPUTY

SHERRI R. CARTER, EXECUTIVE OFFICER/CLERK
CRIM 129 (Rev. 07/13) (replaces CR 108)

Audio Transcript

Case Number: 1:24-cv-24228

Date: n/a

In the matter of:

PETE v COOPER

(Pete_0001620 - Excerpt 1)

**CERTIFIED
COPY**

Reported by:
Trent Kolka

Steno
Official Reporters

1100 Glendon Avenue
Suite 1850
Los Angeles, CA 90024
concierge@steno.com
310.573.8380



M. COOPER
07/21/25
Exhibit 58-B
Ronny Zavosky

United States District Court
Southern District of Florida

Action No. 1:24-cv-24228

In the Matter of:)
Megan Pete v. Milagro Elizabeth Cooper)
_____)

TRANSCRIPTION OF AUDIOTAPE

Clip from Pete_0001620 - Excerpt 1.mp4

Recorded audiotaped clip of Milagro Elizabeth Cooper,
the Defendant.

Transcribed by
Trent Kolka

AUDIO TRANSCRIPTION - JOB NO. 1715349
PETE v COOPER

(Pete_0001620 - Excerpt 1)

1

Appearances

2

Milagro Elizabeth Cooper

3

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AUDIO TRANSCRIPTION - JOB NO. 1715349
PETE v COOPER

(Pete_0001620 - Excerpt 1)

1 MS. COOPER: Do y'all remember as I was
2 going through this case, there were all of these
3 threats of a lawsuit because I had put out this form?
4 There was an exclusive done on a particular channel. I
5 put the forms together, put it online, and Dr. Loffredo
6 had performed a debridement and had taken glass out of
7 her foot per the form.

8 They couldn't do nothing about that because
9 that was not fabricated. That was a real fucking form.
10 Okay. You ain't never talked to that man, he ain't
11 never got up on the stand. You don't know shit. Okay.
12 But that does exist.

13 I get up, and I say, if you can't produce
14 the bullet fragments, how can you prove that that's
15 what came out of her foot? Especially when you have a
16 document that says there were bullet fragments -- I'm
17 sorry, glass fragments that came out. You can't. So you
18 can't sue me for saying that. You cannot sue me for
19 questioning the validity of that story because y'all
20 did not prove that she was shot in court. You did not
21 prove that.

22
23
24
25

AUDIO TRANSCRIPTION - JOB NO. 1715349
PETE v COOPER

(Pete_0001620 - Excerpt 1)

CERTIFICATE

I Trent Kolka certify that I was authorized to and did transcribe the above audio and that the transcript is a true and correct record of the audio provided. I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Trent Kolka T.K

Trent Kolka

Transcriber

2nd June, 2025

AUDIO TRANSCRIPTION - JOB NO. 1715349
PETE v COOPER

(Pete_0001620 - Excerpt 1)

B	M	Y
bullet 3:14,16	man 3:10	y'all 3:1,19
C	O	
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channel 3:4		
COOPER 3:1	P	
court 3:20	performed 3:6	
D	produce 3:13	
debridement 3:6	prove 3:14,20,21	
document 3:16	put 3:3,5	
E	Q	
exclusive 3:4	questioning 3:19	
exist 3:12	R	
F	real 3:9	
fabricated 3:9	remember 3:1	
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form 3:3,7,9	shit 3:11	
forms 3:5	shot 3:20	
fragments 3:14,16,17	stand 3:11	
fucking 3:9	story 3:19	
G	sue 3:18	
glass 3:6,17	T	
L	talked 3:10	
lawsuit 3:3	threats 3:3	
Loffredo 3:5	V	
	validity 3:19	

TRANSCRIPTION OF AUDIOTAPE

Clip from Pete_00000481

1 · · · · · MS. COOPER: · If that's the case, no, I'm not
2 · · retracting a damn thing and I'm not doing nothing. So
3 · · no face, no case. I spoke to my sources, they live on
4 · · the moon. My source is so riled up. So when I said I
5 · · think that Akademiks prematurely tweeted, I want to
6 · · stand by that. I want to stand by that. That Akademiks
7 · · prematurely put that information out, not because it's
8 · · false, but because he got a little bit ahead of himself
9 · · based on the way that things were supposed to go today.
10 · · My sources tell me that Tory Lanez, and I'll repeat this
11 · · later. My force -- my sources telling my forces, bitch I'm in some --inaudible--
12 · · my sources tell me that Tory Lanez'
13 · · representation, his lawyer, did, in a way bring up what
14 · · was tweeted out about the DNA, and she got in trouble
15 · · for it.
16 · · · · · Okay. She got in trouble because allegedly
17 · · it was stated that by the judge, you're not supposed to
18 · · bring up, you know, things that are in the protective
19 · · order. You're not supposed to be saying certain shit in
20 · · court. So because because it wasn't said a particular way and
21 · · because it got handled that way, I want to see if this
22 · · will be in the transcript.
23 · · · · · The transcripts got to come out. My sources
24 · · tell me that Tory Lanez side has the form that that states
25 · · that his DNA was not found on the weapon that Megan
1 · · alleges was used to shoot her. I ain't taking down no
2 · · motherfucking tweet.
3 · · · · · I pray to God that nothing is done today
4 · · that will put a nigga in jail. I pray to God that a
5 · · nigga don't violate nothing today and go to jail by
6 · · saying particular things. But I'm not taking my tweet
7 · · down. And like I said, if it's a lie, then Megan get
8 · · to suing, if it's a lie. And that's the step.
9 · · Now, let me finish the shrimp and we're going to go
10 · · live people. And I'll go back over this in a more
11 · · organized way, and then we'll go from there. Okay. All
12 · · right. I love you, and I'm not deleting my fucking
13 · · tweets. I'm not. And if you feel like your word ain't
14 · · good enough so I don't believe you, then go ahead about
15 · · your business because I said what the fuck I said.
16 · · Okay.
17 · · · · · Akademiks deleted his shit. I'm not
18 · · Akademiks. These hoes ain't going to scare me with no
19 · · suits up. Bitch if you want these synthetic wigs then
20 · · get them. But then you'll have to prove I was lying.

TRANSCRIPTION OF AUDIOTAPE

Clip from Pete_00000481

21· ·Megan said, how you got some information before court
22· ·started? Because Akademiks got the same sources I got.
23· ·And he was giving the information, and he spoke on it
24· ·too soon.

Calendar

CATEGORY:

SUBJECT:

LOCATION:

DETAILS:

milagrogran2@

Friends of Sonstar and Daystar

[https://us02web.zoom.us/j/88278367937?](https://us02web.zoom.us/j/88278367937?pwd=a1hzUGVYM3YwQUNDWGtFQlo4eklkUT09)

pwd=a1hzUGVYM3YwQUNDWGtFQlo4eklkUT09

Sonstar Peterson is inviting you to a scheduled Zoom meeting.

Join Zoom Meeting

[https://us02web.zoom.us/j/88278367937?](https://us02web.zoom.us/j/88278367937?pwd=a1hzUGVYM3YwQUNDWGtFQlo4eklkUT09)

pwd=a1hzUGVYM3YwQUNDWGtFQlo4eklkUT09

Meeting ID: 882 7836 7937

Passcode: 062163

One tap mobile

+16699006833,,88278367937#,,,,*062163# US (San Jose)

+16694449171,,88278367937#,,,,*062163# US

Dial by your location

• +1 669 900 6833 US (San Jose)

• +1 669 444 9171 US

• +1 719 359 4580 US

• +1 253 205 0468 US

• +1 253 215 8782 US (Tacoma)

• +1 346 248 7799 US (Houston)

• +1 929 205 6099 US (New York)

• +1 301 715 8592 US (Washington DC)

• +1 305 224 1968 US

• +1 309 205 3325 US

• +1 312 626 6799 US (Chicago)

• +1 360 209 5623 US

• +1 386 347 5053 US

• +1 507 473 4847 US

• +1 564 217 2000 US

• +1 646 931 3860 US

• +1 689 278 1000 US

Meeting ID: 882 7836 7937

Passcode: 062163

Find your local number: <https://us02web.zoom.us/j/88278367937?pwd=a1hzUGVYM3YwQUNDWGtFQlo4eklkUT09>

START DATE:

END DATE:

ATTENDEES:

6/10/2023 10:30:00 AM(UTC-5)

6/10/2023 11:30:00 AM(UTC-5)

mailto:sonstaruniverse@

mailto:milagrogran2@

mailto:dwanidee@

mailto:joycebryant5@

mailto:thekingsfirstdegree@

mailto:tia@teawithtia.org

REMINDERS:

PRIORITY:

STATUS:

CLASS:

REPEAT RULE:

REPEAT UNTIL:

REPEAT DAY:

REPEAT INTERVAL:

DELETED:

Unknown

Unknown

Normal

None

None

0





quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7364

WRITER'S EMAIL ADDRESS
alexspiro@quinnemanuel.com

VIA ELECTRONIC MAIL

TO: Milagro Elizabeth Cooper, a.k.a. Milagro Gramz,
FROM: Alex Spiro, Quinn Emanuel Urquhart & Sullivan, LLP
DATE: October 29, 2024
RE: Notice of Claims and Preservation of Documents and Information

Introduction and Executive Summary

We are filing a civil action against you, Milagro Elizabeth Cooper (also known as Milagro Gramz or Mobz World), concerning your campaign of harassment and cyberbullying and the false comments you have made regarding Megan Pete (also known as Megan Thee Stallion), including with regard to the criminal case and appeal of the People of the State of California v. Daystar Peterson (BA490599) (the "Case").

For years, you and other bloggers have acted on behalf of Mr. Peterson (aka Tory Lanez) as an online rumor mill churning out falsehoods about Ms. Pete to your tens of thousands of social media followers. You and other bloggers are a mouthpiece and puppet for Mr. Peterson, with a vendetta against Ms. Pete committed to tearing her down at all costs regardless of the truth. Since Mr. Peterson was indicted in 2020 for felony assault with a deadly weapon after shooting Ms. Pete, to his later conviction in December 2022, up through today, you have done Mr. Peterson's public bidding to denigrate, belittle, insult, and spread false and defamatory statements about Ms. Pete on your online platform, for no other reason than to bully, harass and punish Ms. Pete for Mr. Peterson's conviction and to tarnish her reputation, causing emotional distress.

Plaintiff is aware of your conspiratorial relationship with Mr. Peterson and knows you are a paid surrogate of Mr. Peterson. Your conduct has repeatedly confirmed this. Indeed, you promoted the debunked theory that Mr. Peterson did not shoot Plaintiff, when all of the evidence proved otherwise and your theory repeatedly debased. You described Plaintiff as an "angry black woman" and a "lying ass hoe." You accused her of having "a severe drinking problem" who

quinn emanuel urquhart & sullivan, llp

ABU DHABI | ATLANTA | AUSTIN | BEIJING | BERLIN | BOSTON | BRUSSELS | CHICAGO | DALLAS | DOHA | HAMBURG | HONG KONG | HOUSTON | LONDON | LOS ANGELES | MANNHEIM | MIAMI | MUNICH | NEUILLY-LA DEFENSE | NEW YORK | PARIS | PERTH | RIYADH | SALT LAKE CITY | SAN FRANCISCO | SEATTLE | SHANGHAI | SILICON VALLEY | SINGAPORE | STUTTGART | SYDNEY | TOKYO | WASHINGTON, DC | WILMINGTON | ZURICH

“needs to spend more time in a relationship with herself and her therapist and maybe AA.” You regularly enlist “bot” X accounts to attack and harass Plaintiff’s fans and supporters whenever they challenge your false statements about Plaintiff. You even questioned Plaintiff’s competency, asking your followers whether Plaintiff “ha[s] a guardian or no?” and whether Plaintiff has “ever been deemed, like legally retarded?” When Plaintiff asked how to get bloggers like you to stop making false and demeaning posts about her, you responded that Plaintiff should “just get over it, or go away.”

Your misconduct reached new heights earlier this year in June 2024 after you promoted a deepfake video featuring an artificially created image of Ms. Pete engaging in sexual acts without her knowledge or consent (the “Video”). Not only did you “like” a post that shared access to the Video, but you then shared a post on your X account encouraging users to “[g]o to my likes”, where they could obtain access to the Video. Your actions violated Florida law for the promotion of an altered sexual depiction.

Your latest grift involves spreading the false and outlandish claim that the firearm Mr. Peterson used to shoot Ms. Pete has “gone missing,” and falsely suggesting that because it went missing that is why the firearm itself was not presented in court.

Putting aside that the firearm was simply one piece in a mountain of evidence presented by the State against Mr. Peterson—which resulted in a unanimous guilty conviction beyond reasonable doubt—there is simply no basis in truth or fact for your patently false claims. Indeed, the firearm remains in the custody of the Los Angeles Police Department, the truth of which you recklessly disregarded in perpetuating this lie. Nothing prevents Mr. Peterson or his lawyers from testing the firearm. Tellingly, you waited *mere days* before Ms. Pete’s planned documentary released to the public to spin your latest web of lies by amplifying the falsehood that the firearm is missing when it is not. Ms. Pete is confident that the California appellate court will deny Mr. Peterson’s appeal and writ.

Through this letter, we are putting you on notice of the claims and procedures for preserving and retaining potentially relevant information. The civil claims filed against you include but are not limited to promotion of an altered sexual depiction, cyberstalking, intentional infliction of emotional distress, negligent infliction of emotional distress, invasion of privacy: false light, and injunctive relief for your campaign of harassment against Ms. Pete. Ms. Pete reserves the right to amend her complaint to include additional causes of action based on your misconduct, such as defamation.

The procedures described in the following directive (the “Notice”) must be followed.

It is critical that you retain without alteration all documents and information related in any way to the subjects described herein in whatever form they exist, whether hard copy or electronic, maintaining intact all metadata associated therewith.

For purposes of this Notice, the phrase “documents and information” should be interpreted broadly to include, but not be limited to, all forms of written, printed, electronic or recorded matter,

including, but not limited to, letters, memoranda, files, emails, databases, spreadsheets, presentations, notice, voicemails, text messages, instant messages on any platform, video or audio tapes or recordings, calendars, photographs, drawings, logs, lists, tables, agendas, charts, slides, presentation materials, correspondence, facsimiles, photocopies and the like.

I. Documents and Information that Must be Retained

Relevant documents and information include any material that refer or relate in any way to the following:

- (1) Any and all communications regarding Megan Pete, including but not limited to drafts and final published posts appearing on blog sites and social media platforms under the usernames Milagro Gramz, MobzWorld, or Mob Radio;
- (2) Any and all communications with or regarding Daystar Peterson;
- (3) Any and all communications with or regarding Sonstar Peterson;
- (4) Any and all communications with or regarding Kelsey Harris;
- (5) Any and all communications with or regarding Jaquan Smith;
- (6) Any and all communications with Livingston Allen (also known as DJ Akademiks) regarding Megan Pete, Daystar Peterson, or the Case;
- (7) Any and all documents exchanged between you and Daystar Peterson's attorneys, including but not limited to Shawn Holley, George Mgderyan, Jose Baez and Crystal Morgan;
- (8) All documents sufficient to show recordings of episodes from your podcast titled "Mob Radio" about Megan Pete, Daystar Peterson, or the Case.

II. Directive Regarding Preservation and Retention of Documents and Electronic Data

Effective immediately, we are asking you to take any appropriate steps you have not already taken to preserve and retain any documents or information that are or may be relevant to the potential claims described above. You should refrain from alteration, destruction and/or disposal of potentially relevant documents or information. Regardless of any documentation retention/destruction policies that may be applicable, do not discard, destroy, alter or delete any such materials until further notice.

You should review your Inbox, Sent Items, Deleted Items, and other folders for relevant e-mails. You should also preserve any relevant materials stored on your hard drive and relevant shared drives.

This directive applies to all devices, locations, and sources of information, including but not limited to laptops, computers, smartphones, tablets, handheld devices, mobile phones, and other hardware (*e.g.*, USB flash devices), storage location of personnel who take work-related information home, network shared drives, and email servers. This directive applies to all documents regardless of whether such documents are stored at home or work, and regardless of whether such documents and electronic data are stored in "official" or "personal" files. Please preserve drafts and/or multiple copies of the same documents, if you have them, even if they appear to be identical.

Equipment that may contain relevant or potentially relevant documents or electronic data should not be discarded. No new software should be installed on any equipment if it may result in the deletion or alteration of documents. Any automatic purge programs that would result in deletion or destruction of relevant documents should be suspended immediately and until further notice.

In particular, this Notice also overrides any automatic deletion protocol of the files of terminated employees.

III. Duration

As the claims in this potential civil action progress, changes in circumstances may require future modification or expansion of the categories of documents to be retained. It is important that you do not destroy or discard any potentially responsive documents until you are informed that the hold is no longer in effect.

If you have any questions regarding this Notice, please contact Alex Spiro at Quinn Emanuel at alexspiro@quinnemanuel.com or at 212-849-7364.

A handwritten signature in black ink, consisting of the letters 'AS' followed by a horizontal flourish.

Alex Spiro



FORENSIC ANALYSIS OF IPHONE



Prepared at the direction of Counsel

May 5, 2025

by:

Johnathan Bridbord
Managing Director

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com.apple.MobileBackup.plist	4
Conclusion	5

Examination Requested

Identify evidence of WhatsApp and text message deletions.

Item Examined

1. **"Apple_A3081 iPhone 16"** is an Advanced Logical File System extraction of an Apple A3081 iPhone 16, serial number CWYKJVXHX6; SHA256 hash value: A54F25817A3BDAB60356B00984EFFEDA5DD4D4DF270E511AB5FA4849A23FF58E ; Custodian: Milagro Jeffries; created by FTI Director Jeremy Thomas on April 9, 2025.

Findings

DataUsage.sqlite

"DataUsage.sqlite" is a database file that stores usage statistics for apps and system services on the iPhone device. It is used by the operating system to track the amount of cellular and Wi-Fi data consumed by different processes over time. A "DataUsage.sqlite" was identified in the following directory:

- /wireless/Library/Databases/

A review of the "DataUsage.sqlite" file determined that WhatsApp was uploading and downloading data over Wi-Fi on the following days:

- 3/18/2025
- 3/11/2025
- 10/27/2024
- 9/8/2024
- 1/28/2024
- 9/11/2023
- 7/4/2023

Attachment A contains a extraction of the WhatsApp entries detailing the bytes transferred in and out of the device using Wi-Fi.

net.whatsapp.WhatsApp.ServiceExtension

"net.whatsapp.WhatsApp.ServiceExtension" is a component of WhatsApp that handles specific services such as background tasks and notifications. A "net.whatsapp.WhatsApp.ServiceExtension" was identified in the following directory:

- /mobile/Containers/Shared/AppGroup/group.com.facebook.family/_apps/

A review of the file determined it was created on October 12, 2023.

sms.db

"sms.db" is a database file that stores text messages, multimedia messages (MMS), and iMessages. It is central to the Messages app and enables iPhone iOS to organize and manage user communications. A "sms.db" was identified in the following directory:

- /mobile/Library/SMS/

An analysis of the "sms.db" for message deletions was performed. The analysis involved determining which row IDs were missing as a result of message deletions and approximately when were the deleted message chats sent and received.

Attachment B contains the summary of the missing row IDs.

com.apple.MobileSMS.plist

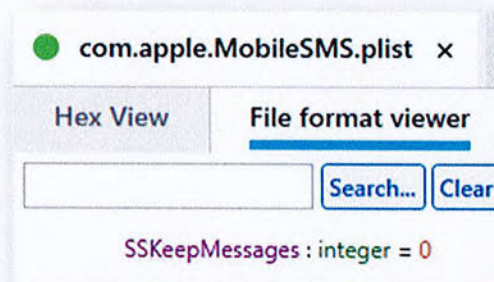
The file "com.apple.MobileSMS.plist" is a property list file used by iPhone iOS for configuration settings related to the Messages app. It stores the configuration setting for message retention preference which controls how long the iPhone should retain or auto delete messages from the "sms.db" file.

A "com.apple.MobileSMS.plist" was identified in the following directory:

- /mobile/Library/Preferences/

A review of the file determined the messages were configured to retained Forever (integer = 0).

Below is a screenshot of the corresponding setting:



com.apple.MobileBackup.plist

The "com.apple.MobileBackup.plist" file is a configuration file in iOS that stores settings and metadata related to backups managed by Apple's systems, such as iCloud Backup or local backups via Finder (macOS) or iTunes (Windows).

A “com.apple.MobileBackup.plist” was identified in the following directory:

- /mobile/Library/Preferences/

A review of the file determined that on March 10, 2025 a restore of the iPhone was performed from a computer backup.

Conclusion

- Evidence was identified that WhatsApp was not installed at the time of data collection.
- Evidence was identified that WhatsApp was communicating over the Wi-Fi network between July 4, 2023 and March 18, 2025.
- Evidence was identified that a WhatsApp service extension was installed on October 12, 2023.
- Evidence was identified showing thousands of SMS messages were deleted between December 11, 2019 and April 9, 2025.
- Evidence was identified showing a restoration of a backup was performed on March 10, 2025.











5:41



< Filters

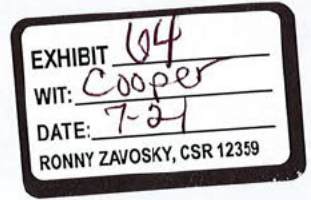
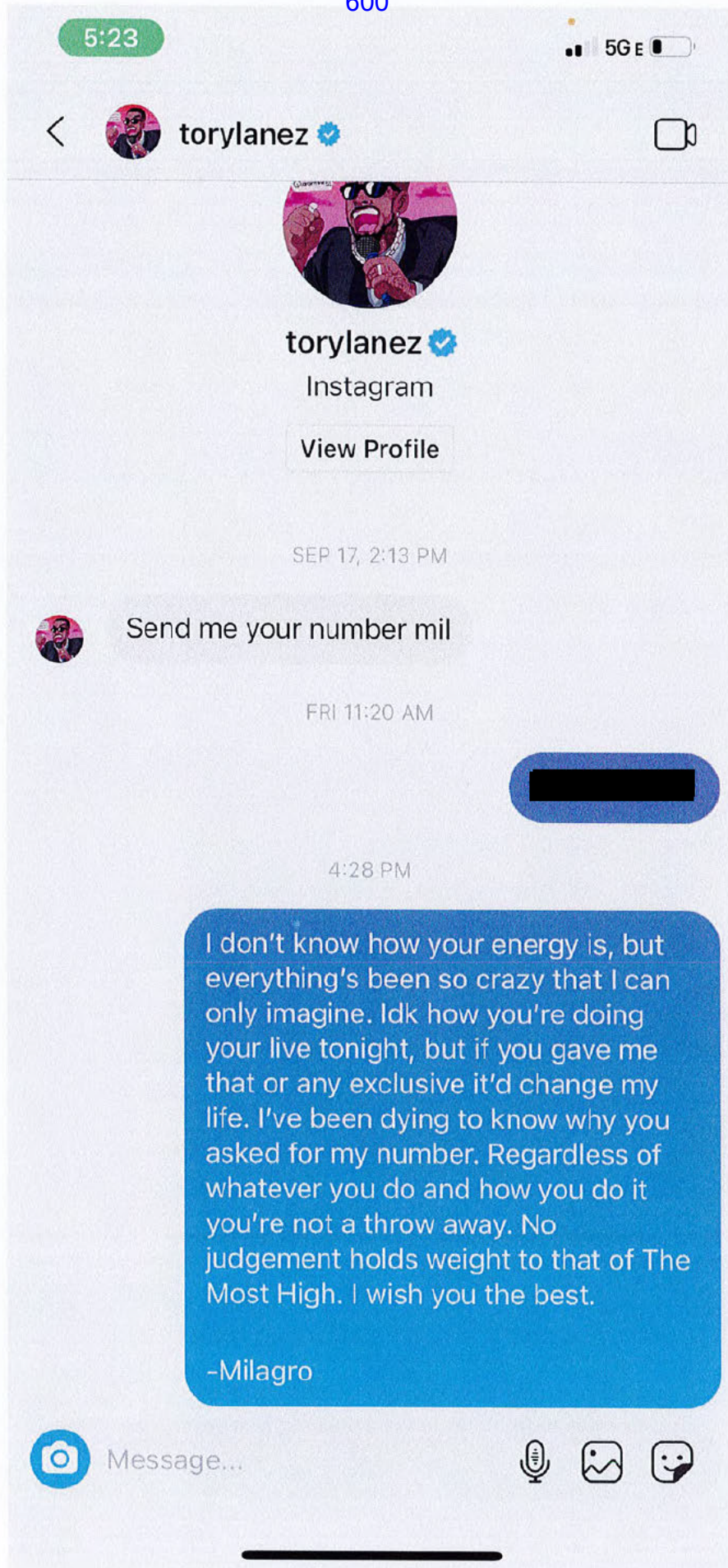
Recently Deleted

Conversations show the days remaining before deletion.
After that time, messages will be permanently deleted.
This may take up to 40 days.

-   **Sonstar Peterson** 30 Days
4 Messages
-   **Nigga Shore** 1 Day
20,451 Messages
-   **+1** 1 Day
34 Messages
-   **Justin** 1 Day
1 Message

Delete

Recover

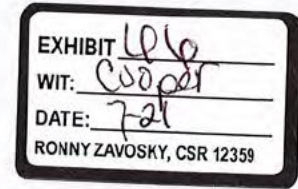






torylanez

Business chat



torylanez

11M followers · 618 posts

You follow each other on Instagram

You both follow unitethepeopleusa and 12 others

View profile

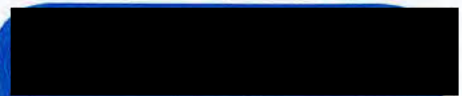
You started a chat with torylanez. We use information from this chat to improve your experience. [Learn about business chats and your privacy.](#)

DEC 13, 2022



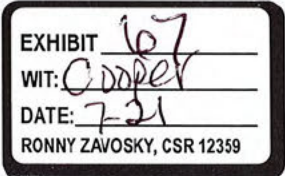
What's ya number gotta ask u something

DEC 13, 2022



DEF MG - 000201

79f73ab9-df3e-4904-913d-c326c4464e78 - +13052194398						
<div> <div>Chat Filters</div> <div> <input checked="" type="checkbox"/> Events <input checked="" type="checkbox"/> History <input checked="" type="checkbox"/> Disclaimers </div> </div>						
<input checked="" type="checkbox"/>	Participant	Entity	Login	Email		
<input checked="" type="checkbox"/>	+ [REDACTED]		[REDACTED]		0	0
<input checked="" type="checkbox"/>	+ [REDACTED] Daystar Peterson		[REDACTED]		3	0
<div> <div>+ [REDACTED] Daystar Peterson</div> <div>2022-12-22 05:33:20.000 AM</div> </div>						
<div> <div>Yoooooow</div> <div>+ [REDACTED] Daystar Peterson</div> <div>2022-12-22 05:33:24.000 AM</div> </div>						
<div> <div>It's Tory</div> <div>+ [REDACTED] Daystar Peterson</div> <div>2022-12-22 05:33:26.000 AM</div> </div>						
<div> <div>Hit me</div> </div>						



Attempted P2P Payments						
Date	Status	Total	Subject	Sender	Action	Recipient
2023-06-14 17:14:22 UTC	PAID_OUT	USD 200.00		Milagro Gramz	Paying	Carlisle Peterson
2023-06-14 16:54:34 UTC	PAID_OUT	USD 1.00		Milagro Gramz	Paying	Carlisle Peterson
2023-04-04 20:52:42 UTC	AMOUNT_EXCEEDED	USD 33,363.00		Angela Peterson	Paying	Milagro Gramz
2023-04-04 19:56:35 UTC	EXPIRED_WAITING	USD 6.00		Angela Peterson	Paying	Milagro Gramz
2022-12-14 05:03:47 UTC	PAID_OUT	USD 10.00	Do a pod with Akademiks 🤝❤️ ya	Chris K	Paying	Milagro Gramz
2022-12-13 01:07:37 UTC	PAID_OUT	USD 10.00	courtesy of Akademiks n the chat niggas	Sev Banks	Paying	Milagro Gramz
2022-09-26 06:46:40 UTC	PAID_OUT	USD 150.00	Frank promo	Onaira A	Paying	Milagro Gramz



Attempted P2P Payments							
Date	Status	Total	Subject	Sender	Action	Recipient	Client
2024-07-11 01:07:12 UTC	DECLINED	USD 500.00	U speak 4 ME & I support U U Blessed Millie	Ruthie T.	Paying	Milagro Gramz	APP
2024-07-11 01:03:36 UTC	DECLINED	USD 500.00	You speak for me & I support you	Ruthie T.	Paying	Milagro Gramz	APP
2024-07-10 02:48:38 UTC	DECLINED	USD 500.00	I get misunderstood 2 I'm ridin wit U We blessd	Ruthie T.	Paying	Milagro Gramz	APP
2024-06-20 00:30:29 UTC	AMOUNT EXCEEDED	USD 77,774.00		Shanika Lawry	Paying	Milagro Gramz	APP
2024-06-02 21:40:17 UTC	EXCEEDED_RETRY	USD 5,000.00		Kaso Money	Paying	Milagro Gramz	APP
2024-05-20 15:40:53 UTC	PAID_OUT	USD 500.00	I miss you!!! I'll give more later	Stacey Alford	Paying	Milagro Gramz	APP
2023-12-22 20:48:56 UTC	PAID_OUT	USD 200.00	10 month back pay Merry Christmas	CORLISS WASHINGTON	Paying	Milagro Gramz	APP
2023-12-22 20:46:43 UTC	DECLINED	USD 200.00	10 month back pay Merry Christmas	CORLISS WASHINGTON	Paying	Milagro Gramz	APP
2023-08-18 23:24:21 UTC	RECIPIENT WAS RE SENDER AMOUNT E XCEEDED MONTHLY	USD 330.00 GBP 500.00	lies and scam vacation	Doc Felton	Paying	Milagro Gramz	APP
2023-07-29 20:31:33 UTC				Datway	Paying	Milagro Gramz	APP
2023-07-21 16:13:06 UTC	PAID_OUT	USD 200.00	Read Email!!!!... Melissa Thomas	Melissa Thomas	Paying	Milagro Gramz	APP
2023-05-26 16:22:27 UTC	PAID_OUT	USD 200.00	mob tithes	Mily P.	Paying	Milagro Gramz	APP
2023-05-06 21:20:00 UTC	PAID_OUT	USD 200.00		Shirlene Smith	Paying	Milagro Gramz	APP
2023-05-05 12:06:54 UTC	PAID_OUT	USD 200.00	flight to LA	Mily P.	Paying	Milagro Gramz	APP
2022-12-15 02:29:46 UTC	EXPIRED_WAITING_O	USD 3,020.00	your hard work	Baisden	Paying	Milagro Gramz	APP



TRANSCRIPTION OF AUDIOTAPE

Clip from Pete_0001453

- 1 · · · · · MS. COOPER: · Let me say this because
- 2 · · somebody's going to be like, you're just a bitch. I am,
- 3 · · but let me, let me be fair. I do think that Megan has mental
- 4 · · health issues. I think she's actually mentally
- 5 · · retarded.